

Decision Notice  
& Finding of No Significant Impact

## Jackson Thinning

USDA Forest Service  
Hood Canal District, Olympic National Forest  
Jefferson County, Washington

### Decision and Reasons for the Decision

#### Background

I have decided to approve commercial thinning of approximately 1,590 acres of second-growth forest stands in the Dosewallips River, Upper West Hood Canal Frontal, and Big Quilcene River watersheds. The thinning would occur to the south and southwest of Mt. Walker. The legal land description for this project is T26N, R2W, Secs. 7-10, 14-18, 20-23.

The thinning prescription follows ecosystem management policies and scientific recommendations. Some road development would be required to efficiently access the stands.

Management direction for the project is contained in the 1990 *Olympic National Forest Land and Resource Management Plan* (LRMP) as amended by the 1994 *Record of Decision (ROD) for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl*. The 1994 ROD, along with its Standards and Guidelines, is commonly known as the Northwest Forest Plan (NWFP).

The Hood Canal North and Quilcene Late-Successional Reserve (LSR) Assessments were completed in 1996 as required by the NWFP; the Jackson Thinning project follows recommendations in the assessment. The assessment recommended variable density thinning<sup>1</sup> within second growth stands (regenerated clearcuts) that are over-dense and lack diversity. Most of the stands in the Hood Canal North and Quilcene LSRs that were clearcut harvested are in a condition of low species diversity, few down logs and snags, and high canopy closure.

The purpose of the thinning is to reduce forest stand density, increase forest stand complexity, and hasten the development of desired late-successional habitat elements such as large trees, multi-storied canopies, snags, coarse woody debris, and canopy gaps. These elements are lacking in the stands proposed for treatment in this project.

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<sup>1</sup> Variable density thinning means selective cutting that leaves trees in a pattern that mimics natural stand diversity.

## Decision

Based upon my review of all alternatives, I have decided to select Alternative B as described and analyzed in the Jackson Thinning Environmental Assessment (EA) and as modified in this Decision Notice. This alternative does not include thinning on Mt. Walker.

Alternative B will be modified by dropping the southeastern-most portion Unit 1 near the National Forest boundary (see attached map). I am excluding this part of Unit 1, approximately 16 acres in size, due to the propensity of legacy old-growth and murrelet potential nest trees, which makes thinning impractical from both an ecological as well as feasibility standpoint. No effects beyond those disclosed in the EA are expected.

Alternative B (modified) will approve commercial thinning of approximately 1,590 acres of second growth stands. Approximately 303 acres will be harvested by helicopter, 1,237 acres cable-logged, and 50 acres ground-based logged. Thinning will be done by “thinning from below” where smaller diameter trees are removed to create additional growing space for the remaining larger trees. In general, approximately 60%-90% crown closure would be maintained across the stands, with the exception of specified gaps and areas used for landings.

The list below provides approximate mileages by road classification and post-harvest treatment associated with this decision:

- 28.9 miles of existing, open Forest system roads will be used and kept open post-project.
- 1.2 miles of existing, open Forest system roads will be used and then closed following project implementation. If funds are available, these roads may be decommissioned as proposed in the Olympic National Forest Access and Travel Management (ATM) Plan.
- 0.1 miles of closed Forest system roads will be opened and reclosed following project implementation.
- 2.4 miles of unclassified, abandoned roads will be used and treated as temporary roads, and will be decommissioned following project implementation
- 3.1 miles of new temporary road will be constructed and then decommissioned following project implementation

Short temporary spur extensions of approximately 100 feet in length would be made as necessary off of existing system roads for public and worker safety purposes or to assist with cable-yarding operations. These spurs, estimated to total less than a mile under any alternative would be decommissioned and blocked from vehicle access following project implementation.

In making my decision, I carefully reviewed the NEPA analysis and public comments received on the EA. I examined the proposed thinning and related activities in relationship to the goals and objectives of the *Olympic Land and Resource Management Plan* (Forest Plan), as amended. I also considered the resource concerns noted in the watershed analyses and the EA. I considered the responsiveness of the alternatives to the significant issues, applicable laws, regulations and policy, Tribal Treaty rights, and public input. I considered the effects of implementing the action alternatives and the no action alternative on the physical, biological, social, and economic environment.

I believe that Alternative B (modified) provides the best balance among these considerations. Implementation of my decision meets the need for action and purpose of the proposed action, and is consistent with the goals, standards and guidelines of the Forest Plan, as amended. Implementing Alternative B (modified) with its project design criteria will result in minimal impacts to resources, and provide long-term benefits to the resources.

My conclusion is based on a review of the record that shows a thorough examination of relevant scientific information, a consideration of responsible opposing views, and the acknowledgment of incomplete or unavailable information, scientific uncertainty, and risk. For example, a response to public scoping raised potential soil impacts as a particular concern and referenced a number of research papers regarding soil impacts related to timber harvest activities and roads. The project's soil scientist and fisheries biologist are familiar with these papers and the environmental impacts from road building and log haul are disclosed in the EA, while also taking into consideration project-specific conditions and design criteria. Although roads and logging activities have the potential to cause significant impacts to soils and aquatic resources, research has also shown that project design criteria such as no-cut buffers are successful in preventing sedimentation into streams. In the case of recently published research conducted primarily at sites in western Washington, including the Olympic Peninsula, Rashin et al. (2006) reported that a 10 meter (approximately 33 feet) buffer can be expected to prevent sediment delivery to streams from about 95 percent of harvest-related erosional features. For the Jackson Thinning, the minimum buffer is 66 feet for non-fish bearing streams and 100 feet for fish bearing streams, 2-3 times that studied by Rashin et al. Regarding recovery of soils from compaction, Miller et. al (1996) found that 7-8 years after harvest, tree height and volume did not differ significantly between conifers planted in skid trails and those outside of compacted areas. The project design criteria for this project would accelerate the recovery process by requiring that compacted and rutted soils are subsoiled, and where possible, replacing large coarse woody debris.

Alternative B (modified) moves 1,590 acres toward the desired future condition identified in the Late-Successional Reserve Assessment and Watershed Analyses. This is the principal component of our purpose of and need for action.

Alternative B (modified) includes the construction and eventual decommissioning of 2.4 miles of unclassified, abandoned roads. While there will be some short-term effects from ground disturbance associated with this activity, the longer term benefits of restoring hydrology, reducing surface erosion, and restoring fish passage outweigh the short-term effects. Watershed conditions will be enhanced by reconstructing and then decommissioning these roads properly.

The important elements of the selected alternative are:

- commercially thin approximately 1,590 acres;
- watershed benefit associated with reconstruction of existing, closed roads and their more effective closure; and reconstruction of unclassified, abandoned roads and their decommissioning;
- estimated KV fund generation of \$133,000; and
- estimated harvest volume of approximately 22.5 million board feet of timber.

This alternative meets requirements under the National Forest Management Act, National Environmental Policy Act, Clean Air Act, Clean Water Act, and all other applicable environmental laws, regulations, and policies.

## Mitigation Measures and Project Design Features

Project design features were developed for Alternative B (modified) to ensure compliance with direction in the *Olympic Land and Resource Management Plan*, as amended, and Forest program direction. Specific measures/features were identified for the following areas; botany, fisheries, noxious weeds, riparian reserves, roads, soil and water, vegetation/habitat, and wildlife. They are listed on pages 41 to 50 of the EA.

## Monitoring and Adaptive Management

Specific monitoring activities associated with Alternative B (modified) are listed on pages 51-52 of the EA.

## Other Alternatives Considered

The Environmental Assessment considered five alternatives in detail; four that would reduce forest stand density and increase forest stand complexity (Alternatives A through D) and one that would not (No Action Alternative).

The No Action Alternative would not have treated any identified stands. I did not select this alternative because if thinning were not to occur, tree-to-tree competition would result in crown recession (low crown ratios), and loss of growth and vigor in stands in the project area watersheds. Trees would become more susceptible to insects and root diseases. Without treatment, the stands would slowly pass through successional phases via natural processes. Over time, opportunities for thinning will be reduced or eliminated, and opportunities to create or hasten development of desired stand conditions could be lost. In addition, opportunities to improve watershed conditions, either through a timber sale or service contract, or future Knudsen-Vandenburg (KV) funded projects, would be deferred or lost.

Alternative A would have treated units on Mt. Walker and Unit 6 that possess features closer to that of late successional forests. For this reason, I chose to allow natural successional patterns to continue without the assistance of thinning. Concerns about impacts to visual quality and recreation access on Mt. Walker would not be impacted with the selection of Alternative B (modified). It's interesting to note that throughout the planning process I continued to hear of public concern of visual quality degradation to Mt. Walker from thinning activities. Visual quality modeling conducted by the University of Washington's Olympic Natural Resource Center, however, demonstrate that implementation of project design criteria would have substantially minimized visual impacts (i.e., not be visually evident to the casual forest visitor) and visual quality objectives would be maintained on Mt. Walker in Alternatives A, C and D, which proposed thinning on Mt. Walker.

Alternative C featured the highest use of helicopters in order to reduce impacts from road-related sedimentation and to soil productivity. I believe issues of sedimentation and soil productivity with respect to temporary road construction can be addressed through project design criteria. As described in paragraph 2 on page 3 of this Decision Notice, scientific research papers and the project's soil scientist and fisheries biologist conclude that road-related sedimentation and soil productivity can be mitigated through project design criteria such as designating no-cut buffers, subsoiling compacted and rutted soils, and where possible, replacing large coarse woody debris. The selection of this alternative would preclude having 2.0 miles of unclassified, abandoned

roads (reconstructed as temporary roads) decommissioned following project implementation and reduce the amount of funding available for project area restoration given the higher cost of helicopter logging.

Alternative D was not selected since the soil, aquatic and wildlife concerns identified by the public and members of the interdisciplinary team, for which this alternative was developed, were also addressed in Alternative B (modified).

### Alternative Considered but Dismissed From Further Study

A number of considerations for alternatives were considered by the interdisciplinary team, but as discussed below, were dismissed from detailed analysis in the environmental assessment. These considerations are summarized as follows:

Ten units were dropped due to stands being ineligible for thinning, either due to age or lack of commercial viability.

Two units considered for fire hazard reduction were dropped from consideration due to the presence of patches of old-growth trees throughout the units, as well as cost prohibitive and environmental impact associated with access the area across Turner Creek

Temporary road construction on Mt. Walker to accomplish thinning treatments was dropped from consideration due to public concern about visual impacts, as well as the low likelihood of future silvicultural management needs for those roads.

Approximately 2.2 miles of new temporary road and 0.4 miles of unclassified road considered for accessing Units 10, 11, 17, and 18 were eliminated due to concerns regarding compliance with the Northwest Forest Plan Aquatic Conservation Strategy. Construction of these roads would have required some substantial cut and fills to create the road prism and several large, temporary stream crossing culverts. The proposed road locations would have also crossed unstable landforms, of which 1,100 feet would have been within 100 feet slope distance of a stream.

A noncommercial restoration alternative was dropped from consideration because this alternative was deemed to be impractical from a feasibility stand point due to low likelihood of funding to implement the project.

### **Public Involvement**

To help identify issues for this project, the Hood Canal Ranger District sent scoping letters on March 18, 2005 to local Indian Tribes and on March 22, 2005 to concerned publics, state, federal, and local government agencies describing the proposed action and requesting comments. The project was also listed in the Forest's *Schedule of Proposed Actions* which describes the proposed action and is posted on the Olympic National Forest internet website. Thirty-eight letters and e-mails were received in response to scoping, along with petitions signed by 144 people opposing the project.

Three significant issues were identified through Interdisciplinary Team deliberations and review of public comments. The interdisciplinary team (IDT) focused its analysis on these key issues.

The alternatives, including the Proposed Action, were developed to highlight trade-offs between the environmental benefits of thinning, and the monetary and non-monetary costs and risks associated with accessing and removing the timber.

The three significant issues are:

1. Thinning fire-regenerated stands that are over 80 years old may harm, rather than help the natural development of those stands.
2. Thinning on Mt. Walker would negatively impact the recreation experience.
3. The construction of temporary roads may negatively impact aquatic conditions by increasing sedimentation.

The EA was circulated for 30-day comment and forty-one comments were received. Comments were considered and addressed as detailed in Appendix E of the EA

I have reviewed and considered all comments received in response to the EA, and have used these comments to enhance the project analysis via the Response to Comments. For example, I considered suggested modifications to the project, and comments were used to help correct and clarify sections of the EA.

## **Finding of No Significant Impact**

After considering the environmental effects described in the EA, I have determined that implementation of Alternative B (modified) does not constitute a major Federal action significantly affecting the quality of the human environment. Thus, an environmental impact statement will not be prepared. I base my finding on the following:

**Context of Action:** The context of the Jackson Thinning activities will be local and short-term in nature and would likely occur over the next five to ten years. Commercial thinning will occur on 1,590 acres of National Forest System Lands, approximately 2.6% of the Lower Dosewallips, Spencer Creek/Marple Creek, and Lower Big Quilcene River 6<sup>th</sup> field watersheds. At the fifth field watershed scale, the project covers less than 1% of the 201,279 acres that make up the Dosewallips River, Upper West Hood Canal Frontal, and Big Quilcene River watersheds.

**Intensity of Effects:** The environmental effects of the following actions are documented in Chapter 3 of the Jackson Thinning Environmental Assessment: commercial thinning of trees, opening closed system roads and closing or decommissioning them after project completion, and constructing or reconstructing and then obliterating and rehabilitating temporary and unclassified, abandoned roads. The beneficial and adverse direct, indirect, and cumulative impacts discussed in the EA have been disclosed within the appropriate context, and effects are expected to be low in intensity because of project design, standard operating procedures, and mitigation. Significant effects to the human environment are not expected. The rationale for this determination on non-significance is based on the environmental assessment, in light of the following factors:

1. Beneficial and adverse effects were considered during analysis of the proposed action and its alternatives. Beneficial effects of the activities proposed under Alternative B (modified) include improved condition of some closed system roads and improved habitat conditions for late-successional species. Several adverse effects were identified

including potential to increase erosion and sediment delivery during project implementation, and increased compaction. Alternative B (modified) has been designed to minimize these and other potentially adverse environmental impacts (EA p. 41-50). Neither the beneficial nor adverse effects as discussed in the EA are deemed to be of sufficient intensity to be identified as significant.

2. There will be no significant effects on public health and safety (EA p. 201). Project design features will protect the worker safety during project implementation (EA p. 47). Effects on water quality (sediment) are expected to be very limited (EA p. 199) due to project design features (EA at 41-50). There will be no effect on air quality (EA p. 200).
3. There will be no significant effects to unique characteristics of the area. The project is not in close proximity to any historic or cultural resources, park lands, prime farmlands, wild and scenic rivers, or ecologically critical areas (EA p. 199). There are no inventoried roadless areas or wilderness within the analysis area.
4. The effects on the quality of the human environment are not likely to be highly controversial. The Olympic National Forest Land and Resource Management Plan permits commercial thinning and road work in the project area, and these activities have historically been conducted in this area. This project affects second growth trees within previously harvested stands.
5. My decision will not impose any highly uncertain, unique, or unknown environmental risks. We have considerable experience with the types of activities to be implemented. Commercial thinning and associated road work have been implemented successfully on the Olympic National Forest in the past, meeting regulations concerning these activities and the protection of National Forest resources. The effects analysis shows the effects are not uncertain, and do not involve unique or unknown risk (see EA Chapter 3).
6. The action is not likely to establish a precedent for future actions with significant effects and does not represent a decision in principle about a future consideration. Commercial thinning and road work are not new activities on the Forest, and follow common silvicultural practices with known results. The project design criteria (EA p. 41-50) are known to reduce risks to the watershed. The EA effectively addressed and analyzed all major issues associated with the project.
7. Implementation of Alternative B (modified) does not represent potential cumulative adverse impacts when considered in combination with other past, present, and reasonably foreseeable actions. The EA effects discussion (EA Chapter 3) indicates no likelihood of cumulatively significant impact to the environment.
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. No sites were found in project surveys. SHPO concurred with the No Effect finding (EA p. 206-207).
9. The action is covered by a Programmatic Biological Opinion (as amended in October 2004), as documented in the Project Consistency Evaluation Form. The finding for the

project is “May Affect, but Not Likely to Adversely Affect” for the northern spotted owl, spotted owl critical habitat, marbled murrelet, and marbled murrelet critical habitat. The finding for the project is “No Effect” for bull trout. Informal consultation was also conducted with the National Marine Fisheries Service for the Puget Sound steelhead, Puget Sound Chinook salmon, Hood Canal summer-run chum salmon, and designated critical habitat for the Hood Canal summer-run chum salmon and Puget Sound Chinook salmon. The project was also determined to have a finding of “May Affect, but Not Likely to Adversely Affect” for these threatened fish species.

The US Fish and Wildlife Service’s Five-year Status Review of the Marbled Murrelet (August 2004) and Northern Spotted Owl (November 2004), northern spotted owl Status Review (USFWS November 2004) and Demography Report (Anthony et al. 2004), and the marbled murrelet Evaluation Report (McShane et al. 2004) were reviewed as part of the environmental analysis for this project.

10. The action does not threaten a violation of Federal, State, and local laws or requirements for the protection of the environment. Analysis has determined that Alternative B (modified) is consistent with the Olympic National Forest Land and Resource Management Plan, as amended, and is in compliance with the Clean Water Act (EA p. 199) and Clean Air Act (EA p. 200).

## **Findings Required by Other Laws and Regulations**

This decision to approve the Jackson Thinning Project is consistent with the intent of the Olympic National Forest Plan’s long term goals and objectives. The project was designed in conformance with land and resource management plan standards and incorporates appropriate land and resource management plan guidelines via the project design features listed in Chapter 2.

In particular, I have reviewed the EA and supporting documents for consistency with the Northwest Forest Plan Aquatic Conservation Strategy objectives in accordance with the 1994 ROD, Attachment B, p. B-10. The applicable watershed analyses and the EA include descriptions of the existing condition, range of natural variability of important physical and biological components of the watersheds, and how the proposed project maintains the existing condition or moves it within the range of natural variability. Based on my review of those materials, I have determined that this project does not prevent attainment of the Aquatic Conservation Strategy objectives.



## Implementation Date

If no appeals are filed within the 45-day time period, implementation of the decision may occur on, but not before, 5 business days from the close of the appeal filing period. When appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition.

## Administrative Review or Appeal Opportunities

This decision is subject to appeal pursuant to Forest Service regulations at 36 CFR 215. Any individual or organization who submitted comments during the comment period specified at 36 CFR.6 may appeal. Written notice of appeal must be postmarked or received by the Appeal Deciding Officer, Regional Forester Linda Goodman, ATTN: Appeals, USDA Forest Service, PO Box 3623, Portland, OR 97208-3623 within 45 days of the date of publication of notice regarding this decision in *The Olympian* (Olympia, WA). The appeal must state that the document is an appeal pursuant to 36 CFR 215, and at a minimum must meet the content requirements of 36 CFR 215.14, and include the name and address of the appellant, and must identify the decision by title, subject, date of decision, and name of the Responsible Official. The appeal narrative must be sufficient to identify the specific change(s) to the decision sought by the appellant or portions of the decision to which the appellant objects, and must state how the Responsible Official's decision fails to consider comments previously provided. If applicable, the appeal should state how the appellant believes this decision violates law, regulation, or policy.

Appeals (including attachments) may be filed by regular mail, fax, e-mail, hand delivery, express delivery, or messenger service. The publication date of the notice regarding this decision in the newspaper of record is the sole means of calculating the appeal filing deadline, and those wishing to appeal should not rely on dates or timelines from any other source. E-mail appeals must be submitted to: [appeals-pacificnorthwest-regional-office@fs.fed.us](mailto:appeals-pacificnorthwest-regional-office@fs.fed.us), and must be in one of the following three formats: Microsoft Word, rich text format (rtf) or Adobe Portable Document Format (pdf). FAX appeals must be submitted to: 503-808-2255. Appeals may be hand-delivered to the Resource Planning and Monitoring Office, 333 SW First Ave., Portland, between 8:00 AM and 4:30 PM Monday-Friday.

It is the responsibility of all individuals and organizations to ensure their appeals are received in a timely manner. For electronically mailed appeals, 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 the receipt of the appeal, it is the sender's responsibility to ensure timely receipt by other means.

## Contact

For additional information concerning this decision or the Forest Service appeal process, contact Tim Davis, Forest Planner, Olympic National Forest; at 1835 Black Lake Blvd. SW, Olympia, WA, 98512, phone: 360-956-2375.



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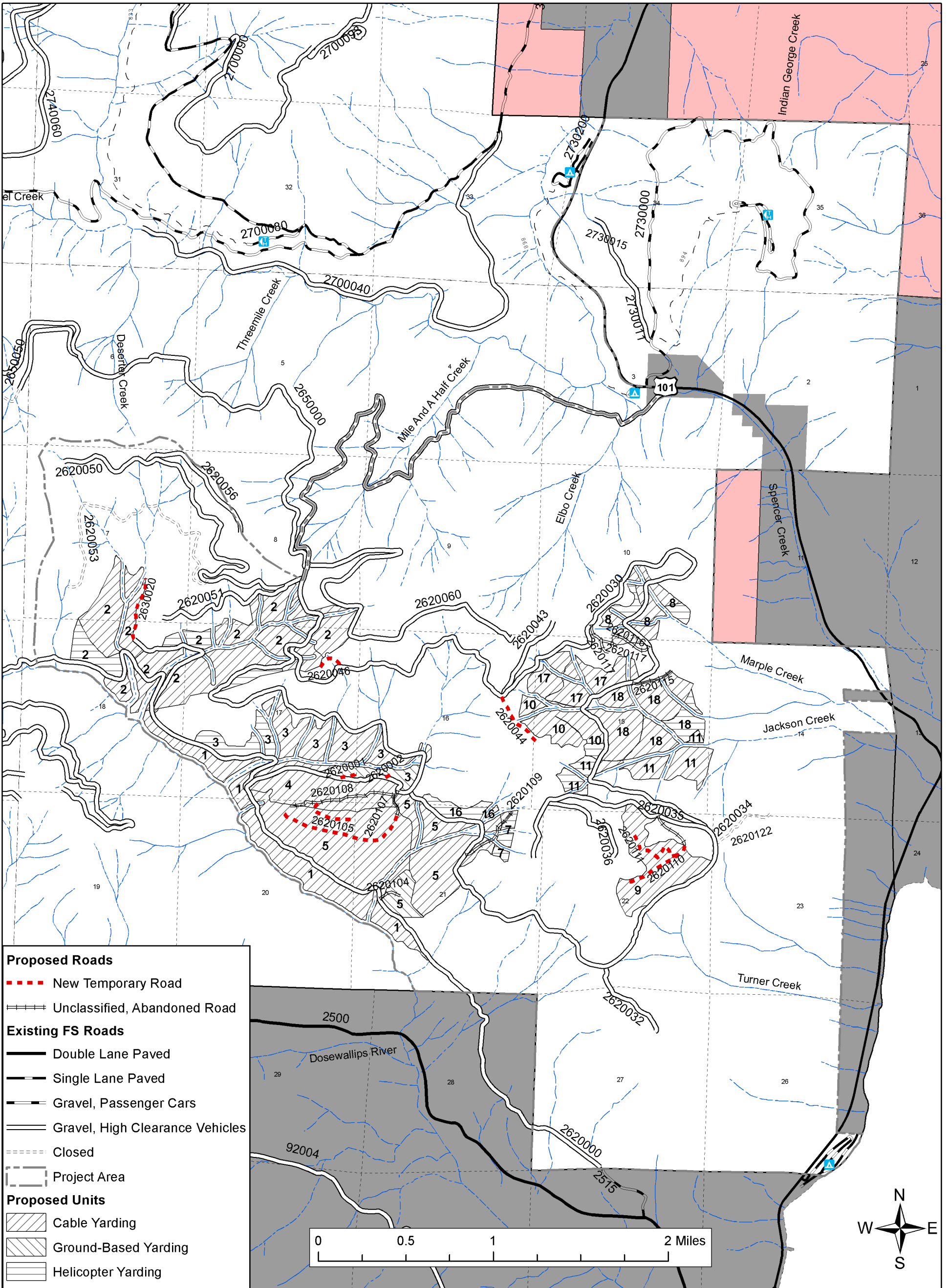
Forest Supervisor  
Olympic National Forest

*Jan 25, 2008*

Date

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Map of Selected Alternative (Alternative B Modified)



**Proposed Roads**

- New Temporary Road
- Unclassified, Abandoned Road

**Existing FS Roads**

- Double Lane Paved
- Single Lane Paved
- Gravel, Passenger Cars
- Gravel, High Clearance Vehicles
- Closed
- Project Area

**Proposed Units**

- ▨ Cable Yarding
- ▩ Ground-Based Yarding
- ▬ Helicopter Yarding

**Other Ownership**

- Private
- Washington State

Temporary road locations and lengths are approximate and may differ from actual project layout and implementation.



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