

Draft
DECISION NOTICE
And
FINDING OF NO SIGNIFICANT IMPACT
ZIGZAG INTEGRATED RESOURCE PROJECT

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

This draft Decision Notice is made available with the Environmental Assessment for the Zigzag Integrated Resource Project pursuant to 36 CFR 218.7(b). The Zigzag Integrated Resource Project Environmental Assessment (EA) contains an in-depth discussion of the setting, ecological processes, resource conditions, the purpose and need for action, the proposed action designed to achieve the purpose and need, project design criteria, alternatives considered, and the effects or benefits of those alternatives.

All section (s.) number references are to sections of the EA unless specified otherwise. The EA is incorporated by reference, summarized below, and can be found at the [Forest's web site](#)¹. Acres and miles are approximate since they are derived from GIS. The Mt. Hood National Forest is referred to as 'the Forest' in this document. The Mt. Hood National Forest Land and Resource Management Plan (1990) and Standards and Guidelines, as amended, are referred to as the 'Forest Plan' in this document.

Purpose and Need (s. 1.3)

Since this proposal contains a suite of projects that have different purposes and address various needs, this section is organized by project type.

Improving Forest Health, Diversity, and Productivity

One desired condition is to have stands that are healthy with growth rates commensurate with site capability and to have forest stands across the landscape with a mix of ages and densities. Because some stands in the project area are not in the desired state, there is a need for active management to change them. The desired condition for the matrix component of the landscape is to have live productive forest stands that can provide wood products now and in the future. The proposed actions provide forest products while achieving other stand and landscape scale objectives.

¹ <https://www.fs.usda.gov/project/?project=57109>

Transportation System Management

The desired condition is to have a landscape accessed by an appropriate transportation network that provides for management access and visitor safety while minimizing resource risk and cost. Because some roads in the project area are not in the desired state, there is a need to make changes. A mix of road treatments is proposed including road repair, maintenance, temporary road construction, stormproofing, closure, and decommissioning.

Aquatic/Riparian Habitat Enhancement

The desired condition for streams, lakes, and riparian areas is for them to be fully functional to meet the needs of aquatic and riparian species and to provide clean water. Because some riparian areas are not in the desired state, there is a need for active management to change them. The proposed actions include adding large woody debris to some riparian areas where it is lacking, and releasing conifers in riparian areas.

Draft Decision

I have reviewed the EA and the information contained in the project file. I have also reviewed and considered the public comments submitted on this project. I have determined that there is adequate information to make a reasoned choice. **I have decided that I will select the proposed action.** The entire suite of proposed actions are described at Section 2.2 of the EA.

Forest Service Handbook 1909.15, Chapter 10, provides a process for making incremental changes to alternatives. Ongoing interdisciplinary analysis and consideration of public comments has resulted in modifications compared to what was described at the time of scoping, and what was disclosed in the preliminary environmental assessment. I believe these changes result in a better proposal and a better decision. I find that the changes will result in relatively minor differences in resource benefits and impacts.

Details of Draft Decision

Table 1 - Summary of Vegetation Management Actions

Purpose & Need	Proposed Action	Mud Creek Acres	Horse Shoe Acres
Improve forest health, growth, and diversity while providing forest products	Variable-density thinning with skips and gaps in Matrix	952	604
Improve diversity and move stands toward late-successional characteristics	Variable-density thinning with skips in Riparian Reserves	119	175
Improve forest health, growth and diversity while providing forest products	Regeneration harvest in Matrix, site preparation and planting	13	0
Improve forest health, growth, and long-term productivity	Sapling thinning and brushing	126	0

Table 2 - Summary of Transportation System Management Actions

Purpose & Need	Proposed Action	Mud Creek Miles	Horse Shoe Miles
Manage the road system to allow for safe timber hauling	Maintain and repair Forest Service system roads	24.0	19.3
Provide access for vegetation management	Construct new temporary roads	3.2	0.7
Provide access for vegetation management	Existing road alignment reconstruction on road alignments that were once temporary roads	1.3	1.3
Provide access for vegetation management	Existing road alignment reconstruction on road alignments that were once system roads	3.2	1.0

Table 3 – Other Transportation System Actions

Purpose & Need	Proposed Action	Miles
Reduce resource risks and maintenance costs associated with Forest Service system roads	Active and passive decommissioning of system roads no longer needed	2.3
Reduce resource risks and maintenance costs associated with Forest Service system roads	Closure and stormproofing of roads that remain on the system	6.5

Project Design Criteria (PDC) in Section 2.2.4 are part of the project and provide important resource protections. No significant impacts were found that would require further mitigation.

Decision Rationale

Thinning – The thinning treatments target overcrowded stands to increase their health and vigor, as well as to enhance diameter and height growth (s. 1.3.1.1 & s. 3.1). Thinning has been designed to have variable density with skips and gaps to enhance diversity (s. 1.3.1.1 & s. 2.2.4 at B8, B15, B16, J6, J7, K1, K5, & N6). Some of the thinning treatments have an objective of enhancing huckleberries (s. 3.1). Some of the thinning treatments result in forest product outputs now, while others are intended to enhance younger stands to be more productive and provide forest products in the future (s. 2.2.1.).

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

Based upon computer model simulation described in the Silviculture Specialist Report, the average diameter in thinned stands, after 50 years of growth would be 22.6 inches diameter in plantations and 27.7 inches diameter in fire-origin stands, compared to no action, which would result in diameters of 17.1 and 17.3 inches respectively. Currently, the average diameters are 11.8 and 13.2 inches respectively. Having larger, healthy trees on the matrix lands suitable for timber production is an important management goal associated with the Northwest Forest Plan’s implementation; and, it is also key for land allocations where the objective is to accelerate the development of late-successional

stand attributes. As forested stands reach an average diameter of 20 inches or larger, they begin to develop some of the characteristics (e.g., larger tree boles) necessary for late-successional dependent wildlife species.

The silvicultural activities associated with my draft decision will reduce the competition for nutrients, moisture, and sunlight, and discriminate against the smaller, overtopped, and/or less vigorously growing trees. As a result, the anticipated growth and developmental rate of the larger trees will increase in comparison to no action. I believe that thinning is prudent to maintain health and growth and to achieve many important goals of the Forest Plan.

Regeneration Harvest – One 13-acre harvest unit is proposed for regeneration harvest to address a dwarf mistletoe disease issue (s. 3.1). The unit is 117 years old and has an average diameter of 11.5 inches.

I believe this action is relatively minor on a landscape scale and is appropriate to address a disease problem. It is a prudent action to achieve Forest Plan goals, namely, to improve forest health objectives by establishing tree species that are not susceptible to dwarf mistletoe. Dwarf mistletoe results in a dramatic decline in growth and vigor and readily spreads to all susceptible species including hemlock and Pacific silver fir which are common in this stand and already heavily infected. (Silviculture Report at 10)

Wood Products – My draft decision will provide forest products consistent with the Northwest Forest Plan’s goal of maintaining the stability of local and regional economies now and in the future (s. 1.3.1.2, s. 3.1 & s. 3.10).

As a result of implementing the silvicultural prescriptions, the project will provide timber and will support jobs important to local communities. It will also result in vigorously growing stands that would be capable of providing future forest products. If I opted to take no action, there would be no wood products provided and it would result in stands with reduced growth and productivity. I believe this action is a prudent step toward sustainable forest management.

Transportation System Management – In the past decades, appropriated road maintenance funds have declined dramatically. Given that reality, I feel it is important to use the opportunity afforded by timber removal projects to use the value of the timber to fund road maintenance and repairs. There is also the opportunity to reduce road maintenance costs by decommissioning and closing roads (s. 1.3.2.1 & s. 2.2.2.3). The temporary roads constructed and the existing road alignments that are reconstructed will be rehabilitated after use (See more on temporary roads on the following page). I have determined that the use and treatments of the roads is prudent and warranted to achieve resource objectives.

Riparian Habitat Enhancement – My draft decision will enhance riparian reserves by thinning in the dry upland portions of riparian reserves that have been found to need this treatment (s. 3.4.6.3).

Management Direction (s. 1.2) – The project has been designed to meet the goals and objectives of the Forest Plan as amended by the Northwest Forest Plan and other amendments. The project would

occur on riparian reserves and matrix land allocations. Even though each land allocation has different goals and objectives, I find that the various proposed actions are appropriate tools to use to move the area toward desired conditions. Further discussion of consistency with standards and guidelines can be found below.

Public Involvement

Section 1.4 describes the various opportunities for the public to submit comments.

I received a wide range of comments. The original letters are included in the analysis file. I documented consideration of the comments received in a separate document titled, "Consideration of Comments." I chose to document what I felt to be the key comments received under the headings: Temporary Roads, System Road Management, Recreation, Regeneration Harvest, Climate Change, Snags and Legacy Trees, Fire-Origin Stands, Riparian Management, Huckleberries, Site-specific Recommendations, and Other.

I considered the comments and suggestions received, and after making some incremental changes and adding some clarification on some topics, I feel that the proposed action provides the best mix of resource outputs, restorations and protections.

- **Temporary roads** are those roads that are built by timber contractors to access log landings and to facilitate efficient logging operations. After use, they are rehabilitated and closed (s. 2.2.2.2). Some commenters suggested that temporary road construction be minimized or eliminated altogether.

The proposed action involves reusing 6.8 miles of existing road alignments and constructing 3.9 miles of new temporary roads. Several project design criteria (including A4, A6, A8, A9, A10, D5, D8, G1, G3, G7, H2, H4, H5, H6, M1, N1, N4, & N5) provide resource protection during construction and use of temporary roads.

I did consider the option of not building temporary roads but decided that it did not warrant a fully developed alternative (s. 2.1.1). That option would result in a large portion of the landscape remaining unmanageable due to the infeasibility of logging with helicopters on such a large scale. Another factor influencing my decision, is that I examined the effects disclosed in the EA for temporary roads and found them to be minimal (s. 2.1.1, s. 2.2.2.2, s. 3.3.1.3, s. 3.3.3.3, & s. 3.6). Temporary roads are addressed in specialist reports including the Water Quality Report, at s. 2.3.1, s. 5.1.2, & s. 5.2.2.2; in the Fisheries Report at s. 5.3.2, s. 12.3.2, s. 16.4, s. 16.5; and in the Soil Report at 13. The new temporary roads have been carefully located to minimize resource impacts, they will be rehabilitated after use, and are in appropriate locations to serve the transportation needs of this portion of the landscape allocated to timber management in the Forest Plan.

The alternative of logging with helicopters instead of constructing or reconstructing temporary roads was considered but not selected because it would not likely be viable and would not likely achieve the purpose and need on a large portion of the landscape.

I considered the science that was cited by some commenters as well as other literature on the subject. The resource specialists including those evaluating water quality, fisheries, and soils, considered the latest science related to roads and used it in their analysis.

- Some commenters suggested that more **system roads** should be decommissioned while others suggested few if any roads should be decommissioned to provide access. The project includes changes to roads based on the Forest-wide Travel Analysis Report (2015) that was refined by site-specific information in a project level analysis (s. 1.3.2, s. 2.2.2.3, s. 3.2). Roads that were found to not likely be needed for future management were proposed for decommissioning to move the project area toward a minimum road system.

Roads are managed for safe access while minimizing impacts to resources. Although some commenters might feel that the only way to resolve road issues is to decommission them, the proposed action includes many other actions to repair and restore roads, and to address erosion and sedimentation issues. The following actions reduce long-term modeled sediment contribution from system roads.

- Decommissioning of unneeded roads
- Road maintenance including blading, shaping, ditch cleaning
- Road repair
- Replacing poorly functioning culverts
- Road closures with stormproofing
- Project Design Criteria have been developed that address road- related erosion and sedimentation. They include the avoidance of maintenance or haul during wet periods.

I believe my team has conducted a sufficient project-level analysis of the transportation system and that the resulting network of both open and closed system roads is the minimum necessary to manage the land. I have considered this road network in terms of the resource risks that each remaining road poses, the current and future need for road access, and the minimization of road maintenance costs. The timber harvest elements of the project will provide substantial value to pay for road repairs and maintenance conducted by timber operators to supplement appropriated funding levels.

Some changes were made to the proposed action to decommission some other roads that were found to no longer be needed. At the time of scoping, the project information sheet identified 0.5 mile to decommission, but after considering comments and looking at some roads more closely, the proposed action was changed to include 2.3 miles that were found to be no longer needed. Similarly, after consideration of comments, road closures were increased from 5 miles to 6.5 miles.

I considered the comments received about the transportation system, and believe the road repairs, maintenance, closures, and decommissioning are appropriate to provide safe access to the Forest while minimizing resource impacts and cost. I examined the effects disclosed in the EA and found them to be minimal while the benefits are substantial (s. 3.2, s. 3.3.3, & s. 3.7.3).

I considered the science that was cited by some commenters as well as other literature on the subject. The resource specialists including those evaluating water quality, fisheries, and soils, considered the latest science related to roads and used it in their analysis.

- Comments were received about **recreation**. Some commenters suggest the area should have no logging and instead be managed for recreation and the economic benefits that accrue to the local economy. Some are concerned that trails, trailheads, and campgrounds would be closed for extended periods to allow logging to occur.

Some commenters feel that the local economy only thrives in the absence of logging, or that the proposed action would curtail recreation and dramatically harm the local economy. Some commenters presumed that all or most of the project would involve clear cutting because they were misinformed.

A review of the social science available on the subject shows that there is a growing local economy based on tourism and recreation. I have reviewed the science and it does not support the notion that carefully planned variable-density thinning, and the other connected actions would detract from or harm the local economy. The literature shows that most of the recreational benefit to the local economy is via downhill ski area use which would not be affected by the proposed action.

The recreation specialist on the team helped design the project, including the project design criteria, to minimize impacts to recreation. The recreation analysis found that minimal interruption would occur. Closures, where appropriate for safety, would be short in duration, and would not occur on weekends or holidays. Some actions would not occur during the peak summer or peak winter seasons. In some cases, flaggers would be used, resulting very short delays.

The landscape architect on the team helped design the project, including the project design criteria, to minimize impacts to scenery. The thinning that would occur in viewsheds was carefully designed to be consistent with visual quality objectives. I believe that the minor alterations to scenery would not likely cause anyone to stay home or recreate elsewhere outside the mountain zone.

If temporary shifts to recreation use patterns do occur, they would likely be to adjacent areas on the mountain and would still likely contribute in a similar way to the local tourism economy.

At the suggestion of the Pacific Crest Trail Association, I have agreed to reexamine the portion of Units 61 and 96 adjacent to the Pacific Crest Trail to better enhance scenery. I find this to be a minor change that involves a special prescription on very few acres.

I considered the comments received and I find that the proposed actions would not likely harm local communities nor would they interfere substantially with recreation.

- Comments were received about the proposal to use the **regeneration harvest method**. Regeneration harvest is proposed for one 13-acre unit with dwarf mistletoe. Some commenters suggested that regeneration harvest be eliminated. Although only 13 acres of the project are

proposed for regeneration, some commenters presumed that all or most of the project would involve clear cutting because they were misinformed.

Unit 129 has health issues that are not allowing it to grow to its full potential. The regeneration harvest would retain 15% of the largest trees individually and in patches to provide an element of diversity as the young plantation grows.

Even though some commenters stated opposition to regeneration harvest, I believe the analysis shows that the proposal is a prudent action to achieve Forest Plan goals, namely, to improve forest health objectives by establishing tree species that are not susceptible to dwarf mistletoe. I have considered these comments and I feel that the impacts and benefits of regeneration harvest are sufficiently documented in the EA.

Other commenters request consideration of additional regeneration harvest in the project area. Even though some commenters stated their desire for more regeneration harvest, I believe the analysis shows that the proposal is a prudent action to achieve Forest Plan goals. I have considered these comments and I feel that the mix of harvest types is appropriate for this place and time.

- Comments were received about **climate change** and the desire to see a quantitative carbon analysis. Some feel that it is best to keep all trees in the forest for maximum on-site carbon sequestration.

I have decided that a quantitative carbon analysis is not appropriate at the project scale. I have reviewed the qualitative analysis of effects and benefits at s. 3.14. Carbon sequestration is only one of the many important values and uses of the forest. Increasing or maximizing on-site carbon sequestration is likely very compatible with many forest land allocations such as wilderness, but I do not find it to be a key objective for the treatment areas proposed in this project. I have reviewed the science and I believe there are far too many disagreements regarding the assumptions and unknowns about the factors that would go into a quantitative analysis that would render the results speculative. Regardless of whether such an analysis would show a net gain or a net loss of carbon both on-Forest and off, I have decided that making stands more resilient to the future climate is important and appropriate.

Some commenters stated their desire for a quantitative analysis or feel very strongly about their desire to maximize on-site carbon sequestration. I have considered these comments and the relevant science. I believe that the proposal is a prudent action to move stands in the right direction to be well positioned to thrive in a changing climate.

- Comments were received about **snags and legacy trees** and the desire to maximize protection for these elements.

The analysis in the Wildlife Biological Evaluation and Specialist Report shows that no action would result in the most snags, but it also shows that the project would result in a sufficient quantity over time to meet the needs of snag dependent species. In the future, if thinned stands are too healthy for trees to die on their own, snags can be created manually. I have considered the science that

was cited by some commenters as well as other literature. I believe that the effects to these stand elements were sufficiently analyzed and documented in the specialist report.

- Comments were received about **fire-origin stands**. Some commenters suggest that stands that were burned many years ago should not be thinned and that they be allowed to grow into maturity on their own. They feel that this would be best for a number of reasons including northern spotted owl habitat and carbon sequestration.

The wildlife biologist has identified needs to accelerate development of key habitat features while protecting legacy trees. If left untreated, most dense stands would have a phase of self-thinning. However, these stands have other objectives including the production of wood products. The Forest has consulted with the U.S. Fish and Wildlife Service and they concurred that the project would not likely adversely affect spotted owls.

I have considered these comments and the relevant science and I find that the proposals for fire-origin stands are appropriate.

- Comments were received about **riparian management**; some supporting passive management while other support active management.

The analyses in the Water Quality Report and the Fisheries and Aquatic Resources Report and Biological Evaluation (s. 3.3 & s. 3.4) show that the proposed actions are appropriate for riparian reserves. Team fisheries biologists have identified which riparian areas are functioning properly on their own and which areas would benefit from thinning in the dry upland portion. The analysis found that streamside protection buffers will be sufficient to provide shade and wood recruitment, and that the dry upland portions of riparian reserves will benefit from the prescribed active management to accelerate late-successional characteristics. The analysis found no change in stream temperature and a net reduction of sediment from the proposed actions.

I have considered the science that was cited by some commenters as well as other literature. I believe that the effects to project area streams was sufficiently analyzed and that the project would meet riparian reserve standards and guidelines and is consistent with the Aquatic Conservation Strategy Objectives because it would lead to improved conditions in the long term (s. 3.4.7).

- Comments were received about **huckleberry management**. Some proposed units have a primary emphasis as the enhancement of huckleberries. Some commenters suggest the use of fire as a means to enhance huckleberry productivity. The use of fire in this area was found to be infeasible. The project area does not lend itself to conditions that would safely support fire as tool to enhance huckleberries because of the very short potential window of opportunity to burn after snow melt and before conditions become too dry and too hazardous. The proposed method of using timber harvest to reduce canopy cover and enhance huckleberries has been used successfully before in other similar areas on the Forest.

I have considered the science that was cited by some commenters as well as other literature. I believe that the effects and benefits of the huckleberry enhancement, as proposed, are appropriate in this area.

- I'm anticipating comments related to the ongoing **forest fire situation**. There has been much more fire on parts of the Forest this year compared to average years. However, large intense stand-replacing wildfire is not unexpected and is considered the natural fire regime for much of the west side of the Forest. In fact, much of the west side of the Forest burned with high intensity in the early 1900s.

My intention here is not to assess the impact of the current fires, but to consider whether to proceed with this project in light of what is currently happening. Fire has not burned in any substantial way in the Zigzag Integrated Resource Project area. When my staff conducts their analysis of effects for a given resource, they include a cumulative effects analysis which could conceivably include wildfire and the effect it has on their resource. To decide what area to use for a cumulative effects analysis, each specialist first considers direct and indirect effects and how far across the landscape that effect is felt. For example, water quality and fisheries analyses consider watersheds and an owl analysis uses owl home ranges. The analysis shows that most of the cumulative effects that could be quantified are not felt past the Upper Sandy or Salmon River watersheds.

Comments have been received from the public suggesting that the Forest allow fires to burn, which is a subject that is outside the scope of project level planning. Since the purpose and need of the Zigzag Integrated Resource Project is not related to fuel reduction or curbing wildfire, and because the fires did not encroach into the project analysis area, I find that the analysis already conducted is sufficient to move forward with this project.

- Comments were received that **included site-specific recommendations**. I have considered many general comments and concerns, some of which I have discussed above. The administrative record also contains evidence of this consideration.

However, some commenters that included site-specific recommendations did not feel that they received an adequate response to those issues. I would like to address that here. It is [agency policy](#)² to consider comments, yet there is no requirement for environmental assessments to respond to comments individually. While I have considered site-specific recommendations, I have decided that item-by-item responses to site-specific concerns are not warranted for this type of project-level environmental assessment. I understand that some commenters would like a detailed dialogue on each point, but I have chosen instead to document how I considered them. The document titled *Consideration of Comments* shows examples of site-specific recommendations and

²https://www.fs.fed.us/im/directives/fsh/1909.15/wo_1909.15_40_Environmental%20assessments%20and%20related%20documents.doc

how they were considered for topics like red tree voles, wet areas, botanical findings, road recommendations, and legacy trees.

I considered the comments received and I believe that the proposed action is both appropriate and consistent with relevant management plans (s. 1.2) and laws (s. 3.15) and that the environmental assessment and specialist reports clearly explain the effects and benefits. I find that the science used to develop the project and to assess the effects is current and valid. I believe that I have made a draft decision that balances the need for these actions against impacts to resources, and I have incorporated adequate design features (s. 2.2), and project design criteria (s. 2.2.4) to minimize impacts to resources and that those impacts have been thoroughly disclosed in the EA and specialist reports.

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

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

In the EA, 'No Action' is not described as an alternative. Taking no action, is assessed in all of the topics in section 3 in terms of how the existing conditions might change over time. This is particularly important for the elements of the purpose and need (s. 1.3) because it helps show the urgency of taking action. Taking no action would result in undesired conditions across the landscape and would not achieve the goals or outputs of the Forest Plan, as amended.

Other Alternatives Considered

The EA discusses comments that were received from the public suggesting the consideration of other alternatives. Details of the suggestions and responses are in the EA at s. 2.1.

- The option of not constructing temporary roads (s. 2.1.1) was considered.
- The option of additional road decommissioning (s. 2.1.2) was considered.
- The option of no regeneration harvest (s. 2.1.3) was considered.
- The option of additional regeneration harvest (s. 2.1.4) was considered.
- The option of deleting fire-origin stands (s. 2.1.5) was considered.
- The option of deleting riparian management (s. 2.1.6) was considered.
- While not technically evaluated as an alternative, the option of taking no action was suggested by many commenters.

The benefits and impacts of the above options that involve deletions are described in the EA and specialist reports under "no action." The rationale for considering these options but not fully developing them or selecting them is discussed in the EA for each section listed above. I have chosen the proposed action, as refined based on public comments, over these other options because it provides a better mix of outputs, resource enhancements, and protections.

The environmental impact and benefits of the project elements suggested for change or deletion have been fully analyzed and disclosed in Chapter 3; the effects were found to be minimal. The analysis

found the impacts to be sufficiently mitigated by project design criteria (s. 2.2.4). Forest Plan standards and guidelines would be met and the project would be consistent with the Aquatic Conservation Strategy (s. 3.4.7.1).

The Forest Plan as amended, directs where it is appropriate and desired to manage vegetation to meet the multiple objectives of resource management. The areas affected by requested changes are on land allocations considered suitable for vegetation management as well as road construction.

While some commenters suggest that the project elements are controversial, I disagree. The projects are consistent with the Forest Plan as amended by the Northwest Forest Plan. These plans were the subject of extensive public participation efforts that found a balance between the various resources and uses of public lands. These plans were also challenged in court, where judicial review found them valid. Even though some hold different views, these plans remain the collective public direction for land management.

I considered the suggested alternatives. Even though I respect the opinions and wishes of commenters and appreciate the dialogue that has occurred, I do not consider the suggestions received to warrant the generation of additional fully-developed alternatives in the environmental assessment.

FINDING OF NO SIGNIFICANT IMPACT (40 CFR 1508.27)

Context

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

The EA implements direction set forth in the Forest Plan, as amended. The Forest is comprised of about 1.1 million acres; the Zigzag Ranger District encompasses about 265,900 acres of the Forest. The proposed actions equate to approximately 0.2% of the Forest and 0.8% of the Ranger District. Given the area affected by the project at both the District and Forest scale, I find that the effects of the project are not significant as disclosed throughout Chapter 3 of the EA and will have a negligible effect at the District and Forest scale.

Intensity

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

1. My finding of no significant environmental effect is not biased by the beneficial effects of the action. Impacts can be both beneficial and adverse. For this project, there are no known long-term adverse effects or cumulative effects to resources such as water quality, riparian areas, wildlife, or heritage resources. These are documented in Chapter 3 of the EA.

2. The project contains design features to protect public health and safety including burning when conditions are appropriate (s. 3.13). Roads that are deteriorating would be repaired to provide for user safety (s. 3.2).
3. There will be no significant effects on unique characteristics of the area. The project is not located in prime farmland or wetlands, and historic, and cultural resources will be protected (s. 3.15). The outstandingly remarkable values associated with scenic and recreational rivers would be protected.
4. The effects on the quality of the human environment are not likely to be highly controversial. I recognize that there is some opposition to forest management, yet I have concluded that the science behind thinning and other vegetation management techniques is sound and is not highly controversial based on a review of the record that shows a thorough review of relevant scientific information.
5. The possible effects on the human environment are not highly uncertain, nor do they involve unique or unknown risks. The effects analyses discussed in Chapter 3 of the EA are based on sound scientific research and previous experience implementing similar projects across the Forest.
6. The action is not likely to establish a precedent for future actions with significant effects because this action is not unusual in and of itself, nor does it lead to any further actions that are unique.
7. The analysis found no significant cumulative effects. Cumulative effects were assessed in each section of the EA including; Stand Productivity, Health and Diversity (s. 3.1.4), Transportation (s. 3.2.3), Water Quantity and Quality (s. 3.3.1.4, s. 3.3.2.4, & s. 3.3.3.4), Fisheries (s. 3.4.8), Geologic Stability (s. 3.5.3), Soil Productivity (s. 3.6.2.3), Spotted Owls (s. 3.7.1.5), Deer and Elk (s. 3.7.3.2 & s. 3.7.3.3), and Snags and Down Wood (s. 3.7.3.2). The analysis considered not only the direct and indirect effects of the project, but also its contribution to cumulative effects. Past, present, and foreseeable future projects have been included in the analysis. The analysis considered the proposed actions with project design criteria.
8. The action will have no significant adverse effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places and will not cause loss or destruction of significant scientific, cultural, or historical resources (s. 3.15.1).
9. My draft decision is consistent with the Endangered Species Act. Consultation with U.S. Fish and Wildlife Service concerning the **northern spotted owl** has been completed (s. 3.7.1.1). The Letter of Concurrence from the U.S. Fish and Wildlife Service found that the project may affect but is not likely to adversely affect the spotted owl. The project is not in critical owl habitat.

Since Endangered Species Act **listed fish** are found within the area, consultation with National Marine Fisheries Service (NMFS) is required for this project. Consultation with NMFS has been initiated and is currently in progress. Project Design Criteria related to listed fish were developed in coordination with NMFS. A final decision for this project will not be made until all required consultation with NMFS has been completed. The Forest will comply with any direction resulting from this consultation process. An analysis found that the project may affect but is not likely to

adversely affect listed fish or their critical habitat (s. 3.4.1). It also found that the project would not adversely affect Essential Fish Habitat as defined by the Magnuson-Stevens Fishery Conservation Management Act.

There will be no significant adverse effects to sensitive species (s. 3.4.2, s. 3.7.2 & s. 3.11). The project will not jeopardize the continued existence of any listed species nor will it cause a trend to federal listing or loss of viability for these species.

10. My draft decision will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA (s. 3.15). The action is consistent with the Forest Plan (each part of section 3). The proposed action is consistent with the National Forest Management Act regulations for vegetative management. There will be no regulated timber harvest on lands classified as unsuitable for timber production (36 CFR 219.14) and vegetation manipulation is in compliance with 36 CFR 219.27(b). The project complies with Executive Order 12898 regarding environmental justice (s. 3.15.2). No disproportionately high adverse human or environmental effects on minorities and/or low-income populations were identified during the analysis or public involvement process.

Other Findings Required by Law or Regulation

Section 3.15 identifies relevant laws and references to documentation in the EA.

Clean Air Act: My draft decision is consistent with the Clean Air Act. Burning would be scheduled in conjunction with the State of Oregon to comply with the Oregon Smoke Implementation Plan to minimize the adverse effects on air quality (s. 3.13 & s. 3.15.5).

Clean Water Act: The Water Quality Report discusses the Sandy and Salmon Rivers' listing as impaired under the Clean Water Act (303(d)). The project would not exacerbate any of the water quality issues there (s. 3.3). Implementation of my draft decision will incorporate Project Design Criteria, as described in the EA (s. 2.2.4), which will protect and maintain water quality conditions. It is anticipated that only minor amounts of sediment would actually enter any stream as a result of implementation (s. 3.3.3.3).

Endangered Species Act (ESA): Consultation has been completed for northern spotted owls (s. 3.7.1). Consultation is ongoing for listed fish (s. 3.4.1).

Magnuson-Stevens Fishery Conservation and Management Act: The project would not adversely affect essential fish habitat for chinook or coho salmon (s. 3.15.12).

National Forest Management Act: The proposed actions were developed to be in full compliance with NFMA via compliance with the Forest Plan, as amended. The project area has been found to be suitable for timber management (s. 3.1.6 & s. 3.15.6). Other requirements are discussed in the Mt. Hood Forest Plan section below.

National Historic Preservation Act: The Forest operates under a programmatic agreement between the Oregon State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation for

consultation on project determination. Consultation with SHPO was completed for this project (s. 3.15.1).

Consistency with Mt. Hood Forest Plan

I find that the proposed action is consistent with direction found in the Forest Plan as amended. It is consistent with standards and guidelines specific to the relevant land allocations and it is consistent with the applicable Forest-wide standards and guidelines (s. 1.2 & s. 3).

- **Aquatic Conservation Strategy** – The project will contribute to maintaining or restoring aquatic conditions and is consistent with the Aquatic Conservation Strategy objectives (s. 3.4.7.1).
 - I have considered the relevant information from the watershed analyses completed for the watersheds (s. 1.2.2 and the Zigzag Project Additional Information document). This project has adopted the concepts for riparian reserve delineation described in the watershed analyses (s. 2.2.1.1).
 - I find that the Project Design Criteria (s. 2.2.4), such as stream protection buffers and operating restrictions on ground-based machinery, will minimize impacts and maintain the function of key watershed indicators that make up elements of the Aquatic Conservation Strategy. These key indicators for water quality, habitat, flow, channel condition, and watershed condition will be maintained or enhanced (s. 3.4.7.1).
- **Management Indicator Species** – I have considered the impacts to Forest Management Indicator Species (MIS) (Wildlife Report at s. 5.0). MIS for this portion of the Forest include northern spotted owl, pileated woodpecker, American marten, deer, elk, salmonid smolts and legal trout. I find that the proposed action is consistent with the standards and guidelines pertaining to MIS, and that based on the limited effects to any MIS, the proposed actions do not contribute toward a negative trend in viability on the Forest.
- **Invasive Plants** – I find that the proposed action is consistent with Pacific Northwest Invasive Plant Program Preventing and Managing Invasive Plants Record of Decision issued in 2005 and the Site-Specific Invasive Plant Treatments for Mt. Hood National Forest Record of Decision issued in 2008 (s. 3.12). Design criteria are included to minimize the spread and establishment of invasive plants (s. 2.2.4).
- Compliance with the **2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines** (s. 3.4.2, s. 3.7.4 & s. 3.11).

I have reviewed the relevant sections in the Environmental Assessment and I find this draft decision to be consistent with the 2001 Record of Decision. For many of the stands, survey and manage does not apply because of the Pechman exemption and the proposal to thin stands under 80 years of age. Other stands were surveyed where there was likely habitat. The only species found is the red tree vole. I find that the proposed action will adequately protect this species (Wildlife Report at s. 6.1.1).

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

I approve an exception related to the **National Forest Management Act**, as documented at section 3.1.5.

FW-306 indicates that timber stands should not be regeneration harvested until they have reached or surpassed 95 percent of culmination of mean annual increment measured in cubic feet. FW-307 explains that exceptions to this may be made where resource management objectives or special resource conditions require earlier harvest.

Mean annual increment is a calculation that measures stand growth. Culmination of mean annual increment is the time in a stand’s life when it is considered biologically mature (i.e., when growth slows and when decay and mortality increase).

Unit 129 has not culminated. Regeneration harvest is proposed to deal with an urgent dwarf mistletoe situation. The action creates early-seral conditions without impacting suitable spotted owl habitat or old growth.

I find that an exception for FW-306 is appropriate to achieve the stand health goals for this area.

I approve an exception related to **open-road density**, as documented at section 3.7.3.2.

The project would close some roads. Open-road density is one way to measure disturbance to deer and elk. The project would close about 10 miles of open roads and reduce open-road densities in both summer and winter range. Summer range open-road density would be reduced from 3.5 to 2.8 miles per square mile which is still above the 2.5 miles per square mile in Forest Plan standard FW-208. In winter range, the open-road density would be reduced from 4.7 to 4.5 miles per square mile which is above the 2.0 miles per square mile in Forest Plan standard FW-208.

These high road densities are somewhat misleading because so much of the adjacent land is Wilderness and roadless areas which are excluded from the calculation (as directed by the Forest Plan). The Wilderness boundaries often hug close to the roads so that the roads are in the analysis area but the roadless areas are not, which skews the road density. Deer and elk in these areas can easily seek and find solitude in these roadless areas. It is highly unlikely that the road densities could be reduced any further within the project area as most of the remaining roads access Wilderness trailheads, campgrounds, or the adjacent power line corridor and these need to remain open.

I find that an exception for FW-208 is appropriate to achieve the road management goals for this area.

Predecisional Administrative Review Process

This draft decision is subject to predecisional administrative review pursuant to 36 CFR 218, Subpart B (also called the “objection process”). The rule can be found at the [USDA website³](#).

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

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

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

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

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

- Postal Delivery: *Forest Supervisor, Objection Reviewing Officer, Mt. Hood National Forest, 16400 Champion Way, Sandy OR 97055.*

³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5442116.pdf

- Emailed to: objections-pnw-mthood@usda.gov. Please put OBJECTION and the project name in the subject line. Electronic objections must be submitted as part of an actual e-mail message, or as an attachment in Microsoft Word (.doc or .docx), rich text format (.rtf), or portable document format (.pdf) only. E-mails submitted to addresses other than the one listed above or in formats other than those listed above or containing viruses will be rejected. It is the responsibility of the objector to confirm receipt of objections submitted by electronic mail. For electronically mailed objections, the sender should normally receive an automated electronic acknowledgement from the agency as confirmation of receipt. If the sender does not receive an automated acknowledgement of receipt, it is the sender's responsibility to ensure timely receipt by other means.

For further information regarding this project, contact Jim Roden at 541-604-1230 or by email at james.roden@usda.gov. For further information regarding objection procedures, contact Michelle Lombardo at 971-303-2083 or by email at michelle.lombardo@usda.gov.

Reserved for Final Decision

9/24/2020

Bill Westbrook
District Ranger
Zigzag Ranger District
Mt. Hood National Forest

Date Published

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