



# DECISION MEMO

## Eightmile Salvage

March 2006

USDA Forest Service, Mt. Hood National Forest  
Barlow Ranger District  
*Hood River and Wasco Counties, Oregon*

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### INTRODUCTION

Areas of the Surveyors Ridge Late Successional Reserve (LSR) have experienced very high levels of mortality to trees from bark beetles over the last three to five years. This has in some cases eliminated habitat for the northern spotted owl. The Assessment for the Surveyors Ridge LSR indicates that high levels of mortality trigger the need to consider treatment to meet LSR objectives (pp. 75, 80, 83). These reserves are to be managed to protect and enhance old-growth forest conditions. Treatments inside these reserves may occur in stands up to 80 years of age if the treatments are beneficial to the creation and maintenance of late-successional forest conditions. Salvage guidelines in the Northwest Forest Plan are intended to prevent negative effects on late successional habitat, while permitting some commercial wood volume removal. (NWFP Record of Decision page C-13). The Eightmile area has never been nesting, roosting, and foraging habitat for the northern spotted owl; however, it has functioned as dispersal habitat. High levels of insect mortality have rendered the habitat no longer suitable for northern spotted owl dispersal. The mortality of trees within the proposed units has reduced canopy closure below 40 percent, thus making the stands non-functional as habitat for northern spotted owl. The area was considered dispersal habitat within a Late Successional Reserve prior to the insect outbreak.

High levels of tree mortality and downfall in the Eightmile area have also increased fuel loadings to a level which has created a fuel hazard.

### PROPOSED ACTION

The Barlow Ranger District proposes to salvage approximately 222 acres of lodgepole pine, ponderosa pine and pacific silver fir trees killed by or currently infested with insects in the area near Eightmile Meadow. A number of the western larch trees in the stands are also dead, and those trees less than 15 inches in diameter at breast height may also be salvaged after snag retention requirements have been met. Larch trees with dwarf mistletoe infection will be removed if their diameters are below 15 inches at breast height. Larger trees with larch dwarf mistletoe will be girdled and left standing to provide snag habitat and downed wood recruitment for nutrient cycling. The area is within the Surveyor's Ridge Late Successional Reserve; however, the stands to be treated are not late successional forest. Eightmile units will have a combination of aggregated and dispersed retention. Retention is the term for what will remain in the units after

salvaging the majority of the dead and diseased trees. The aggregated retention will be a linear feature, adjacent to trails 450 and 456. Live trees remaining in the unit will include western hemlock, spruce, western larch, pacific silver fir, noble fir, ponderosa pine, and white pine, at an average density of approximately 37 trees per acre. The density and location of live trees naturally varies across the project area. After salvage, retention will be light and will therefore be planted with a variety of species suitable to the site which will provide northern spotted owl habitat in the future. Diverse forests are more resilient to forest insect pests. Salvage is not expected to influence the population dynamics of the present bark beetle outbreak, as few trees contain bark beetle larvae.



An average of ten of the largest snags per acre will be retained within the sale area, some in aggregated retention areas. Log retrieval would be done with a tractor-based system. Fuel treatments would include a combination of excavator piling and burning. Downed wood requirements will be met by leaving at least three tree length logs per acre of the largest available downed wood post-salvage.

**Table 1. Units in Eightmile Salvage**

<b>Unit</b>	<b>Acres</b>	<b>Treatment</b>	<b>Yarding method</b>	<b>Fuel treatment</b>
1	54	Salvage w/ retention	Whole tree yard	Burn landing piles and jackpots
2	50	Salvage w/ retention	Whole tree yard	Burn landing piles and jackpots
3	65	Salvage w/ retention	Whole tree yard	Burn landing piles and jackpots
4	53	Salvage w/ retention	Whole tree yard	Burn landing piles and jackpots

Less than ½ mile of temporary road construction is authorized with this decision (project record B.10, B.29 and B.31). All temporary roads and landings will be rehabilitated at the close of harvest activities.

Post-harvest, the area will be inter-planted for species diversity to create a forest more resilient to insect and disease, which will improve long-term habitat for late-successional species. Natural regeneration is also expected.

### **LOCATION**

The location of the proposed action is approximately 18 air miles west of Dufur and nine air miles west of Mt. Hood, Oregon. The legal description for the project area is: T2S, R11E, Sections 25, 30, 31 and 36. Enclosure 1 displays the location of the proposed action.

### **OBJECTIVES OF THE PROPOSAL**

Specific management objectives of the project are to:

- Accelerate the development of spotted owl habitat within the project area by providing a diversity of tree species to meet long-term habitat needs.
- Reduce fuel hazards by removing concentrations of dead pine and fir.

If no action is taken, the stand will regenerate to the same species of trees susceptible to the current insect infestation. Insect outbreaks are cyclic and can be expected to occur here again. The likelihood of this area becoming functional habitat for northern spotted owl is reduced if the stand is composed largely of lodgepole pine and true fir. Long-term maintenance of habitat is better assured with a forest of tree species resilient to its most common insect visitors.

Fuel loads are high and create a risk in this area that receives a great deal of recreation use. A high intensity fire could damage soils and be difficult to contain without a fuel break. Without a safe anchor point, suppression activities would be difficult and the fire may carry into other areas of the LSR.

## **SCOPING AND PUBLIC INVOLVEMENT**

The Forest Service conducted public scoping to identify any concerns with the proposed activity. Scoping notices were sent to federal and state agencies, the Confederated Tribes of the Warm Springs, and interested individuals on May 2, 2005 and requested that comments be received by May 25, 2005 (see project file for mailing list). Four letters associated with the project were received by the comment period closing date. The interdisciplinary team and the decision maker reviewed these comment letters. Concerns in the letters focused on the presence of a designated critical habitat unit for northern spotted owl, suitability of the project as one that may be categorically excluded from documentation in an environmental assessment or impact statement, and recreational trail use. Changes were made to unit configuration based on information gathered during the analysis process and further public input over the summer. Recreational trails were avoided, as were areas identified as possible wilderness areas by Senator Wyden in 2004. Key site riparian areas were identified on the ground and unit boundaries adjusted to avoid entry (project record B.6) On August 12, 2005, new maps and a narrative of design criteria were provided to local bicycle shops and a Portland- based mountain bike club to address their concerns regarding the popular bike trail in the sale area.

A court ruling in July 2005 determined that certain projects categorically excluded from documentation in an environmental assessment or impact statement are required to request public comment through legal notice. Therefore, the proposed action was published in *The Oregonian*, the newspaper of record for the Mt. Hood National Forest, on October 10, 2005 for a 30-day comment period. Maps of the salvage units, adjusted for recreational trails, key site riparian, and proposed wilderness were included in the scoping letter mailed to the public on October 11, 2005, with the formal request for comments.

We received four comment letters from the public during the formal comment period. Comments focused on the benefits of snags and concerns over salvaging within an area designated as critical habitat for the Northern spotted owl. Consideration of these comments is documented in the project record, at C.1 – C.4. We also received 247 pre-printed postcards from one environmental group.

## **DECISION**

I have decided to approve the proposed action with the design criteria and mitigation measures described on page five of this document. The rationale for my decision is based on: 1) the proposed action fully meeting management objectives, 2) the project's consistency with regulatory framework, 3) on-the-ground review and discussion with district resource specialists, 4) review of the Biological Evaluations (BE), and 5) review of projects on the district with similar prescriptions (project record B.14).

I have decided to implement this through a commercial timber sale. Total volume is estimated at 1.2 MMBF (million board feet) or 2275.9 CCF (hundred cubic feet).

## **REASONS FOR CATEGORICAL EXCLUSION**

The Council on Environmental Quality (CEQ) regulations at 40 CFR 1507.3 provide that agencies may, after notice and comment, adopt categories of actions that do not normally have significant impacts on the human environment and that do not require preparation of an environmental assessment (EA) or an environmental impact statement (EIS). It is my determination that this action may be categorically excluded from documentation in an EA or EIS as it is within Forest Service Handbook (FSH) 1909.15, Section 31.2, Category 13.

Category 13 was approved in July of 2004 and allows salvage of dead and dying trees on areas not to exceed 250 acres, the construction of less than 0.5 miles of temporary road, and incidental removal of trees for landings, skid trails, and road clearing. This category cannot be used for even-aged regeneration harvest or vegetation type conversions. This project fits entirely within the parameters of category 13 and can be excluded from documentation in an EA or EIS. It is a salvage project on approximately 222 acres and would include the construction of less than one half mile of temporary road.

## **EXTRAORDINARY CIRCUMSTANCES**

According to Forest Service Handbook 1909.15, Section 30, a proposed action may be categorically excluded from further analysis and documentation in an environmental impact statement (EIS) or environmental assessment (EA) only if there are no extraordinary circumstances related to the proposed action. Resource conditions that should be considered in determining whether extraordinary circumstance related to the proposed action warrant further analysis and documentation are listed below (A-G). As stated in Section 30.3 of the handbook, “the mere presence of one or more of these resource conditions does not preclude use of a categorical exclusion. It is the degree of the potential effect of a proposed action on these resource conditions that determines whether extraordinary circumstances exist” (FSH 1909.15).

After review of the biological evaluations, documents in the project file, and specialist reports, I have determined that there are no extraordinary circumstances that indicate a presence of possible significant effects. This analysis is summarized below.

- a. Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species.**

I am aware that this proposal is within a designated Critical Habitat Unit (CHU). I have carefully considered whether or not this warrants further analysis in an EA or EIS and concluded that it does not for the following reasons: 1) It has been determined that the designated critical habitat for northern spotted owl (NSO) is non-functional due to the high levels of mortality in the stands and that removing this mortality will have no effect on the NSO. The area has never been nesting,

roosting and foraging habitat and is not functioning as dispersal habitat; 2) It is expected that interplanting for species diversity will return the area to functioning habitat over the long-term (project record B.9) and therefore have a beneficial effect; 3) In discussions with the US Fish & Wildlife Service, they have agreed that areas with as much mortality as the Eightmile Meadow area are no longer providing dispersal habitat for NSO and that a salvage of this nature would have no effect on the species (project record B.18).

I recognize that this project is within the Surveyor's Ridge Late Successional Reserve. I have carefully considered whether or not this warrants further analysis in an EA or EIS and concluded that it does not for the following reasons: 1) Issues have been identified and considered in the design of this proposal. 2) Effects analysis have been completed by the interdisciplinary team and have not been found to warrant alternative treatments. 3) The area to be treated is not old growth or functioning NSO habitat. 4) The project is consistent with recommendation in the Surveyor's Ridge LSR Assessment and in compliance with guidelines in the NWFP ROD for salvage.

The Regional Ecosystem Office for the Pacific Northwest Region has recognized that this LSR is experiencing high levels of insect and disease mortality in all vegetation types. Risk reduction of up to 1,000 acres in the LSR is a treatment exempted from further Regional Ecosystem Office review (project record B.21).

Findings in the BEs show implementation of the proposed action would have *no effect* on the northern spotted owl, bald eagle, Canada lynx, Middle Columbia steelhead trout, Lower Columbia steelhead, Columbia River bull trout, or Chinook and coho salmon essential habitat. (See project record B.8 and B.9).

No species proposed for listing or Forest Service sensitive species are expected to be affected by this project (project record B.8, B.9, and B.19).

- b. Floodplains, wetlands, or municipal watersheds.** Site review by the district hydrologist confirmed the project area is not located in, or will not affect any floodplain or wetland. The project is partially located within the municipal watershed for the City of Dufur; however, removing a portion of the dead trees will not adversely affect the watershed. (See Hydrologic Input in the project record, B6.)
- c. Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas.** The proposed harvest site is not located within any of the congressionally designated areas or areas identified as possible wilderness areas by Senator Wyden in 2004 (see map B.24 in the project record).
- d. Inventoried roadless areas.** The proposed harvest site is not located within any inventoried roadless areas (See map B.26, in the project record).

- e. **Research natural areas.** The proposed area does not include land designated as Research Natural Areas (See management area map B.25, in the project record).
- f. **American Indians and Alaska Native religious or cultural sites.**  
A cultural resource overview and field survey was completed for this project. No known religious or cultural sites, archeological sites, or historic properties or areas are located within the area proposed for harvest (archaeology report, project record B.20).
- g. **Archaeological sites, or historic properties or areas.**  
A cultural resource overview and field survey was completed for this project. No known religious or cultural sites, archeological sites, or historic properties or areas are located within the area proposed for harvest (archaeology report, project record B.20).

No significant effects to extraordinary circumstances have been identified.

### **FINDINGS REQUIRED BY OTHER LAWS**

**National Historic Preservation Act:** No cultural resources would be adversely affected by the proposed action. Cultural resources have been surveyed and site-specific mitigation (avoidance) has been applied. If further sites are identified during project implementation, activity would cease and the district archaeologist would be consulted (*Ibid*).

**Endangered Species Act:** The district wildlife biologist evaluated the proposed action with regard to the Endangered Species Act as documented in the BE. The BE found implementation of the proposed action would have *no effect* on the northern spotted owl, bald eagle, Canada lynx, or bull trout. Although the units are within a late successional reserve, they are not currently providing northern spotted owl habitat due to the high level of mortality and species composition. The district fish biologist evaluated the proposed action with regard to the Endangered Species Act as documented in the BE. The BE found implementation of the proposed action would have *no effect* on the Middle Columbia River steelhead trout or essential habitat for Chinook and coho salmon.

**National Forest Management Act Requirements for Vegetation Manipulation:** The National Forest Management Act and accompanying regulations require that several specific findings be documented at the project level. All proposals that involve vegetation manipulation of tree cover for any purpose must comply with the requirements found in 36 CFR (Code of Federal Regulations) 219.27(b). The proposed activity complies with NFMA (refer to the Consistency with NFMA document in the project record at B.17). According to NFMA, the established limit of 40-acre openings shall not apply to the size of areas harvested as a result of natural catastrophic condition such as fire, insect and disease attack, or windstorm. Salvage sales may occur on lands not suited for timber production.

**Clean Water Act and State Water Quality Laws:** The District fisheries biologist has



determined that this project complies with the Clean Water Act, state water quality laws, and would protect beneficial uses. Eightmile Creek is listed on the Oregon Department of Water Quality 303(d) list for sedimentation from river mile 0-34.5, (in which the project area is located), and spawning and rearing temperatures from river mile 0-22 (downstream of the forest boundary). With design features and BMPs in place, water quality would be maintained throughout implementation of this project (project record B.6).

**Environmental Justice:** I assessed the proposed action to determine whether it would disproportionately impact minority or low-income populations, in accordance with Executive Order 12898. No disproportionate impacts to minority or low-income populations were identified during scoping or the effects analysis (See project record B.22, C1, C.2, and C.3).

**Migratory Bird Treaty Act:** I find that there are no known substantial losses of migratory bird habitat expected from the implementation of this proposal (Wildlife BE, project record B.9). For other migratory birds that may use the project area, the proposed action **will not cause a trend toward federal listing or loss of population viability** within the subunit.

**Other Laws or Requirements:** The proposed action is consistent with all other Federal, State, or local laws or requirements for the protection of the environment and cultural resources.

### **CONSISTENCY WITH THE MT. HOOD FOREST PLAN**

The proposed activity is within Management Area B6 (Special Emphasis Watersheds). See map B.25 in the project record. The goal of this management area is to maintain or improve watershed, riparian and aquatic habitat conditions, and water quality for municipal uses and/or long-term fish production. A secondary goal is to maintain a healthy forest condition through a variety of timber management practices (Forest Plan, Four-246). Boundaries for Management Area A9 (key site riparian) were ground-truthed and unit boundaries adjusted to avoid salvage harvest within MA A9 (Hydrology Report, project record B.6).

The salvage units are within the Surveyor's Ridge Late Successional Reserve, but the stands themselves do not provide habitat for the northern spotted owl. The mortality in the stand triggers a need to assess treating the area of concern as outlined in the Surveyor's Ridge LSR Assessment (see Wildlife Biological Evaluation). This decision to salvage is consistent with the need for action. See LSR Assessment page 83.

According to standards and guidelines in the Northwest Forest Plan, "salvage of dead trees is not generally considered a silvicultural treatment within the context of these standards and guidelines". "Salvage is defined as the removal of trees from an area following a stand-replacing event such as those caused by wind, fires, insect infestations, volcanic eruptions, or diseases (NWFP ROD page C-13)." In this case, insect infestation was the stand-replacing event. Salvage guidelines are intended to prevent negative effects



on late successional habitat, while permitting some commercial wood volume removal. Late-successional conditions are not associated with stands less than 80 years old (NWFP ROD page C-14). The stands to be salvaged are less than 80 years old. Remnant snags that are likely to persist will be left. The live trees to be retained will continue to age and provide a large structure component.

Survey and manage species were considered for this project. Surveys are not required for the two survey and manage aquatic mollusks listed for the Mt. Hood National Forest. There are no activities planned in riparian reserves, thus no water bodies (and potential habitat) would be affected by project activities. Since suitable habitat does not lie within proposed treatment areas surveys are not required (project record B.30). The project area does not provide habitat for any of the terrestrial species (project record B.29) or botanical species (project record B.19) on the survey and manage list. The proposed project is in compliance with the provisions of the 2001 Northwest Forest Plan Record of Decision.

### **DESIGN CRITERIA AND/OR MITIGATION**

Design features are used to minimize the environmental impacts of the proposed actions. Included are regional and Mt. Hood NF standards, guidelines and policies designed to address resource management concerns.

#### **Heritage Resources:**

- Cultural resource surveys have been completed. No known cultural sites are located within the area proposed for harvest. However, if additional cultural sites are discovered during implementation, provisions to ensure cultural resource protection would be enacted.

#### **Soils and Water:**

- Oregon State Best Management Practices and Soil and Water Conservation Practices would be applied to all proposed harvest and fuel reduction activities. A list of practices that would be applied for this project is contained in the Water/Soils Section of the project file. Application of BMPs would follow the guidance in the Soil and Water Conservation Practices Handbook (Forest Service Handbook 2509.22).
- No harvest activity would occur within riparian areas.
- Existing skid trails would be used where practical.
- In order to protect the soil resource, operations would occur on sufficiently dry, frozen, or snow-covered soils.
- An average of ten snags per acre will be left in units for downed woody debris recruitment, a percentage of these snags will be provided in aggregated retention areas.
- Existing downed woody debris, in excess of 30 tons/acre will be left on site for nutrient cycling and rodent habitat.
- Temporary roads will be rehabilitated using such methods as ripping, seeding, placing woody debris, and berming.

**Noxious Weeds:**

- All logging and road maintenance equipment will be cleaned of dirt and plant parts prior to entering the sale area.
- All skid trails and landings will be seeded with certified weed-free native or non-persistent non-native seed following harvest activities if soil disturbance occurs.
- The Forest Service will continue to monitor/survey project area for new invader weed species.

**Recreation and Visuals:**

- Snowmobiles may be rerouted if harvest activities affect Road 44 during the winter motorized recreation season.
- Trails 450 and 456 will be buffered 75 feet on each side to allow continued shading of trail surface to protect soil moisture and tread integrity.
- Trails will not be crossed with logging equipment.

**Wildlife:**

- Interplanting species that will survive the next cycle of mountain pine beetle or fir engraver will improve owl habitat over the long run.
- These may include western larch, western white pine, Engelmann spruce, and Douglas-fir.
- Ten of the largest snags/acre will be retained within the project boundaries. Retention patches of snags are provided by areas buffering trails 450 and 456. Western larch with dwarf mistletoe that are retained for structure will be girdled within 5 years of salvage activities.
- Snags felled for safety reasons will be left in place.

**Transportation:**

- Restrict commercial haul when soil moisture is high enough for subgrade material to be in its plastic limit (Best Management Practice, or BMP).
- Rehabilitate temporary roads and skid trails, which includes ripping, revegetation, and water barring as necessary (BMP).
- Time construction activities to minimize erosion (BMP).
- Control surface road drainage to disperse runoff and minimize erosion and sediment from the road (BMP).

**APPEAL OPPORTUNITIES**

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 Gary Larsen, Forest Supervisor. An appeal should be addressed to the Forest Supervisor at any of the following addresses. Postal: ATTN.: 16400 Champion Way, Sandy, OR 97055-7248; Street location for hand delivery: 16400 Champion Way, Sandy, OR (office hours: 8-4:30 M-F); fax: 503-668-1423. Appeals can also be filed electronically at: [appeals-pacificnorthwest-mthood@fs.fed.us](mailto:appeals-pacificnorthwest-mthood@fs.fed.us). Electronic appeals must be submitted as part of the actual e-mail message, or as an attachment in Microsoft Word (.doc), rich text format (.rtf), or portable document format (.pdf) only. E-mails submitted to email addresses other than the one listed above, or in formats other than those listed, or containing viruses, will be rejected. It is the responsibility of the appellant to confirm receipt of appeals submitted by electronic mail.

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

**IMPLEMENTATION**

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

**CONTACT PERSON**

Detailed records of this environmental analysis are available for public review at the Hood River Ranger District. The file includes scoping information, biological evaluations, specialist reports, and an archaeological report. For further information about this decision, please contact Kimberly Smolt at the Hood River Ranger Station, 6780 Highway 35, Mt. Hood-Parkdale, OR, 97041, or phone; 541-352-6002.

**SIGNATURE OF DECIDING OFFICER**

/s/ Michael J. Hernandez

Michael J. Hernandez  
District Ranger

2 Mar 06

Date

Enclosure

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## Definitions

Aggregated retention: Remaining trees are left in clumps or groups.

Dispersed retention: Remaining trees are widely spaced throughout the salvage unit.