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Department of
Agriculture

Forest
Service

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File Code: 1950

Date: December 20, 2002

2370-CD-02-11-S

Subject: **FINDING OF NO SIGNIFICANT IMPACT DECISION NOTICE and
CONSISTENCY DETERMINATION for the
Burdoin Mt. Vegetation Management Environmental Assessment**

PROPOSED ACTION: The Forest Service, Columbia River Gorge National Scenic Area, (CRGNSA) proposes to reduce hazardous accumulations of forest fuels in the Wildland-Urban Interface areas on Burdoin Mountain and increase ecological stability by removing or thinning trees 8 inches or less in diameter at breast height (DBH). The resultant slash would be burned where concentrations lie, hand or machine piled and burned; lopped and scattered; or chipped. 386 acres will be thinned over a time frame of five years. While no commercial timber harvest is proposed, some of the thinned trees will be made available to the public, through permit, for posts, poles and firewood products.

PURPOSE AND NEED: The Burdoin Mountain area has undergone significant changes over the last century, which may not be apparent to the casual visitor. Stands that were once open and park-like are now dense with small trees. These areas also generally contain less than one-half to one-third as many large trees in the over-story than occurred before changes in land use occurred about 100 years ago. The current condition is primarily a result of fire exclusion and timber harvest, which created an under-story of small diameter trees, an accumulation of fine texture woody material, and the absence of large diameter oak, pine and fir.

This complex structure creates a "fuel ladder" which allows surface fires to travel upwards into shrub under-stories and even tree crowns. These conditions lengthen expected fire return intervals and increase the expected fire intensities, while decreasing the average fire tolerance of tree stands. Wildfires today will burn hotter with longer flame lengths, and are more likely to be lethal to all trees, including large trees. Fire sensitive tree species, especially Douglas and grand fir are much more prevalent than they were historically in the analysis area.

The difference between existing and desired conditions represents a need for management action. The principal purpose of the Proposed Action in the Burdoin Mountain Planning Area is to:

- Reduce the risk of high intensity wildfires that have the potential to result in catastrophic loss of life, property, and natural resources.
- Promote more open stands of large trees, and restore ecological stability of the plant communities and the role of low intensity fire.
- Improve public and firefighter safety during initial attack of low to moderate intensity wildfires by creating defensible space and safety areas in strategic locations.

DECISION AND SUPPORTING RATIONALE: After reviewing the analysis in the EA, and considering comments from the public, it is my decision to select alternative 2, Burn Slash Piles, including the implementation requirements and monitoring. This alternative will treat 386 acres. Trees 8 inches or less in diameter at breast height (DBH) will be removed or thinned from within the five vegetation types identified in the EA Chapter 1. The following are common features of the vegetation management prescription for all the vegetation types within the treatment areas:

- No treatment of shrub layer.
- After implementation of the thinning prescriptions consider the need for creation of a few larger tree snags (7-12" DBH) by girdling available trees. (A description of desired size and number of snags per acre is located in Appendix B of the EA).
- Designate 0.1 to 0.5 acre diversity areas within treatment areas, where no treatment will occur. These will amount to approximately 2% of the treated area.
- Leave all existing snags and down and dead wood in place.
- Seed Re-vegetation Seed Mix described in Appendix B of the EA.
- Limb layer 1 and 2 pines up to 6 ft.
- Haul routes will be existing roads wherever possible. Where units are not accessible from existing roads, haul routes will be pre-designated.

The factors I used in making my decision included consideration of resource issues identified during analysis, and meeting the underlining need for the proposal. I find this action, refined by an interdisciplinary team of resource scientists, responds in an appropriate manner to both meeting the need for the proposal, and addressing the resource issues that were raised. My reasons for selecting this alternative are outlined below:

Meeting Purpose and Need

The selected alternative treats the most acres and therefore meets the purpose and need for the project better than the other two alternatives. The untreated acres of the No-burn alternative are the result of lack of access for hauling slash out after treatment. The selected alternative allows the burning of slash, making hauling it out of inaccessible areas unnecessary.

Resource Issues

- Air Quality-Smoke created by slash burning will not create a significant effect on the natural or human environment based on the amount of burning planned and the implementation requirements listed on page 3 of this Decision Notice and on EA pages 21-23.
- Soils – The selected alternative emphasizes the use of existing haul routes for hauling out useable wood products and piling slash. It will minimize soil compaction and disturbance because burning slash piles eliminates the repetitive use of haul routes for removing slash. It will also require fewer new haul routes.(EA page 31 and 68).
- Plants/Wildlife and Riparian Reserves and Buffers – The selected alternative moves more acres toward the desired condition for plant and wildlife habitat, riparian reserves and buffers. There were no major differences between the action alternatives for effects on plants and wildlife (EA page 68).
- Scenic Resources – The selected alternative moves more acres toward the desired condition for scenery (large diameter oak trees and wildflowers visible from key viewing areas). Because more acres are treated, short term effects of scenic disturbance is slightly higher but is balanced by the longer term beneficial effects including protection of screening trees and large diameter oaks from wildfire (EA page 39, 43 and 68).
- Fire Risk – The selected alternative treats the greatest number of acres and removes the greatest tonnage of hazardous fuels (EA page 68).

I find that the Burn Slash Pile alternative for this project is consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan provided that it is implemented as described in the EA, and the following conditions are applied:

Air Quality

1. Minimize the amount of material burned by chipping or making it available for other uses such as post and poles and habitat restoration projects where feasible.
2. Burn material when weather conditions minimize impacts from smoke. These include: burning on cloudy days when residual smoke cannot be seen; burn during low visitor time periods; and burning during periods of atmospheric instability for better smoke dispersal.
3. Washington State air quality requirements shall be applied to slash-pile burning operations.

Natural Resources

4. Off road equipment shall be minimized to the maximum extent possible to minimize impacts to wildlife. Emphasis should be on hand piling, bunching, etc.
5. The alignment of new haul routes shall be pre-designated and agreed to by the CRGNSA hydrologist, engineer, and ecologist prior to piling activities.
6. Track-mounted piling equipment shall operate on top of slash to minimize soil disturbance.
7. Ground based slash piling methods shall not be allowed on slopes steeper than 30%. These steeper areas will be hand piled if fuel reduction is necessary.
8. All haul routes having detrimental soil compaction will be water-barred, ripped to a depth of 18", mulched with wood chips and seeded with native grass seed. Haul routes that have access to any main roads shall be closed off to eliminate use of the road after project completion.
9. Scenic Area Management Plan standards for soil productivity shall be met in the project area. These state that not more than 15% of an activity area will be detrimentally disturbed. This includes compaction, displacement, puddling and removal of organic layers exposing mineral soil.
10. The access road for unit B3 will have pre and post-project maintenance that will correct existing drainage problems on the road. This maintenance will help reduce existing erosion and resulting sedimentation.
11. No mechanized slash piling equipment shall be allowed within 200 ft. of perennial streams. This material shall either be removed by hand or lopped and scattered in the riparian area. Any cut material that ends up in a stream channel shall be removed from the channel and placed at least 15' away. This will ensure channel stability will be maintained by minimizing disturbance in the riparian area and keeping small, unstable material out of the channel.
12. Mechanized equipment shall not be allowed to operate within 20' of ephemeral channels except to cross them at designated crossings.
13. Activities within 50 feet of any stream shall be carefully monitored to ensure that the integrity of the immediate buffer area is not compromised. Treatment shall be kept to a minimum in this zone.
14. The existing small head-cut area just south of Burdoin Mountain road shall be stabilized.
15. Haul route crossings of ephemeral draws will have culverts installed if the trail will stay in place over the winter. This will allow any runoff to pass through the crossing unimpeded. All fill material in draws will be removed from the ephemeral draw crossings after hauling is completed.
16. All wetland-dependent vegetation shall be left undisturbed.
17. All noxious weed infestations shall be avoided as much as possible to avoid potential spread. Infestations shall be sprayed with herbicides such as Garlon and Round-Up.
18. To supply habitat for small mammals living in the project areas, 120 linear feet of course wood for every acre of habitat treated shall be maintained. Course wood should be at least six inches in diameter or greater (if available), and includes that which is currently on the ground, and trees that are cut during the project implementation. Project activities shall occur outside of the growing

season of plants and the general nesting/rearing season for birds, gray squirrel and other wildlife species (March 1 to August 31).

19. No mechanized equipment (including chainsaws) shall be used between December 15 to March 31 to reduce cumulative disturbance to deer/elk on their designated winter range. These activities may occur if the scenic area or state wildlife biologist determines that the area is not being used as winter range (such as due to mild winter weather).
20. If an active wintering squirrel nest is found, a 300 ft undisturbed area shall be maintained to minimize disturbance. Very limited hand thinning may be used to within 100 ft at the discretion of the CRGNSA wildlife biologist or ecologist.
21. All known squirrel nest sites shall be included in diversity areas where no activities are to occur as delineated in the description of the alternatives.
22. All other active sites or known sites of sensitive wildlife species shall likewise be protected within diversity areas.
23. If any sensitive wildlife or flora is located during the project, the Scenic Area wildlife biologist or ecologist shall be notified and appropriate measures taken to ensure protection.
24. Areas where post treatment field surveys indicate that a majority of the vegetation was removed and slow vegetation recovery is expected shall be seeded with a native seed mixture to reduce the chance of surface erosion. (See Revegetation Seed Mix in EA Appendix B).
25. Opportunities exist to enhance habitat for native wildlife species after treatment by re-vegetating all disturbed areas with desired native bunch grass, forb and shrub species. Appropriate forage species for big game winter range includes bluebunch wheatgrass (*Agropyron spicatum*), Idaho fescue (*Festuca idahoensis*), Serviceberry (*Amelanchier alnifolia*), arrowleaf balsamroot (*Balsamorhiza sagittata*), deerbrush (*Ceanothus integerrimus*), and others (see Revegetation Seed Mix in the EA Appendix B). Limited use of herbicides may be needed to control non-native grasses during the establishment of the native species.
26. Open grassy meadows shall be disturbed as little as possible (CRGNSA botanist shall help identify potential slash burn pile locations).
27. Known sites of sensitive species shall be protected by a buffer (200 ft) around each site. Any newly found sites shall be given similar protection.

Scenic Resources

28. Stumps within the near Foreground (100') of all travel-ways and/or trails shall be flush cut. No slash shall be hand piled within the near Foreground of all travel-ways and/or trails.
29. 2% of each project unit shall contain clumps of untreated area per the design of the alternatives in the EA Chapter 2. Some of these clumps (at least 100 x 100 feet in size) shall be field designed to provide screening of existing development. Clumps shall be dispersed throughout each project unit with concentrations near FS boundaries and in the near Foreground of SR-14 (100' from edge of pavement). The CRGNSA landscape architect shall be consulted for location of leave clumps near the FS boundary and SR-14.
30. No permanent tree marking shall be used.

Recreation and Recreational Facilities

31. Equipment crossing user-made trails shall be pre-designated and minimized. Any damage to trail facilities shall be repaired immediately after implementation.
32. For public safety purposes trail and the immediate area the trail serves shall be closed to the public during treatment activities.
33. Trail users and general public shall be notified by posting warning signs at key trail intersections, corral area and along Courtney road. Post message explaining the reason for treatment activities at the Courtney Road trailhead. Develop and distribute press release/key messages to local press and web site.

Cultural Resources

34. No burning or machine piling of slash shall take place within the cultural resource site perimeters as delineated by the Forest Service archeologist before implementation is initiated.
35. If any additional cultural resources are discovered during the implementation of this project, the Forest Service shall immediately notify the State Historic Preservation Office and the appropriate tribal governments.

PUBLIC INVOLVEMENT: Public notification of the proposal occurred in the winter 2001 edition of the Gorge Views, a quarterly newsletter of scheduled actions published by the National Scenic Area (CRGNSA). The Gorge Views is mailed to approximately 250 individual, agencies and organizations who have expressed an interest in activities proposed within the National Scenic Area. Copies of this newsletter are also made available at Skamania Lodge and at Multnomah Falls Lodge, two popular recreational sites visited by many who come to the Columbia River Gorge. Gorge Views is also posted on the Scenic Area's Web Site. A scoping letter was sent to interested parties and landowners in the Burdoin Mt. Area on March 13, 2002. Comments received are summarized on pages 12-13 of the EA.

The EA was sent to interested parties and posted on the CRGNSA website on July 11, 2002. The Notice of Availability for 30-day public comment on the Burdoin Mt. EA was published in The Oregonian on July 11, 2002. The comment period closed August 12, 2002. Four comment letters were received and are summarized in Appendix C of the EA attached to this Decision Notice.

OTHER ALTERNATIVES

Alternative 1 – No Action Alternative

Under the no action alternative, no tree thinning or associated projects would occur on federal lands within the Burdoin Mountain Planning Area to reduce hazardous fuel loading buildup or stabilize ecological function.

- This alternative would not meet the need to reduce hazardous fuel loading buildup or stabilize ecological function.

Alternative 3 – No Burn

The vegetation management prescriptions are the same as for Alternative 2. The difference between Alternative 2 and 3 is that Alternative 3 is a no-burning alternative. Slash would be lopped and scattered, chipped on site, or chipped at a collection area such as an existing road. Because the jackpot burn and slash pile burning tool would not be available on sensitive, steep and inaccessible ground, fewer acres can be treated.

- This alternative does not fully meet the purpose and need for the project because fewer acres would be treated and therefore it would leave more risk from future wildfire and its effects.
- This alternative would create more soil compaction and disturbance due to repetitive hauling over the same haul routes than Alternative 2.

Other alternatives that were considered, but eliminated from further development:

Prescribed Fire Alternative

The use of prescribed fire (under burning) was considered and eliminated from detailed analysis because the present level of fuel loading and fuel configuration does not support the safe application of this management tool in this Wildland-Urban Interface. As described in Chapter 1 of the EA, the exclusion of fire has resulted in an increase in fuel loading, with accumulations of needle duff, branches, brush, and under-story trees, creating a "fuel ladder" which allows surface fires to travel upwards into shrub under-stories and even tree crowns. Prescribed burning would probably burn hot with high flame lengths lethal to all trees, including large trees.

FINDING OF NO SIGNIFICANT IMPACT: Based on the site-specific environmental analysis documented in the EA, the comments received from the public, and the agency response to those comments, I have determined that the implementation of the Burdoin Mt. Vegetation Management Project is not a major Federal action that will significantly affect the quality of the human environment; therefore, an Environmental Impact Statement is not needed.

Beneficial and adverse direct, indirect, and cumulative environmental impacts discussed in this EA have been disclosed within the appropriate context and will have little intensity. No significant effects to the human environment have been identified with the thinning, hauling, slash treatment and associated actions on 386 acres on Burdoin Mt.

This determination is based on the implementation requirements designed into the selected alternative and the following factors:

- There will be no significant effects on any Threatened, Endangered, or Sensitive wildlife, fish or plant species with this project (EA, page 68).
- The proposed project area was surveyed for all Northwest Forest Plan Survey and Manage species and none were found. (EA page 66).
- The CRGNSA Archeologist determined that this undertaking (Burdoin Mt. Vegetation Management, as mitigated) would have “No Adverse Effect” to any cultural resources (EA pages 46-47). The State Historic Preservation Officer for Washington concurred with this determination.
- This project complies with EO 12898 regarding environmental justice. No disproportionately high and adverse human and environmental effects on minorities and/or low-income populations were identified during the analysis and public information process (EA, page 66).
- The Burdoin Mt. Vegetation Management project will not significantly affect public health or safety. This action will not set a precedent and was not found to threaten a violation of any Federal, State, or local law. This project will follow Washington State Air Quality Standards as per condition #3 on page 3 of this Decision Notice and Consistency Determination.
- No significant irreversible or irretrievable commitment of resources were found for the Burdoin Mt. Vegetation Management project. There are no flood plains, wild and scenic rivers, wilderness, or other unique designations in the project area except the general designation as a National Scenic Area which is protected by the consistency determination on page 3 of this document and is based on the findings contained in Chapter 3 of the EA.

APPEAL RIGHTS: This decision is subject to appeal pursuant to 36 CFR 215. Any written Notice of Appeal of this decision must be fully consistent with 36 CFR 215.14 ("Contents of Appeal") and must include the reasons for appeal. A written notice of appeal, in duplicate, must be filed with the Regional Forester, Forest Service-USDA, 1570 APPEALS, P.O. Box 3623, Portland, OR 97208-3623 within 45 days of the date the legal notice of this decision appears in The Oregonian.

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

CONTACT PERSON: For further information concerning this decision contact: Diana L. Ross, Landscape Architect, at the Columbia River Gorge National Scenic Area, 902 Wasco Avenue, Hood River OR 97031. Her telephone number is (541) 308-1716 and e-mail address is dlross@fs.fed.us.

/s/ Kim M. Titus _____

KIM M. TITUS
Acting Area Manager

Date December 20, 2002

Legal Notice of Decision Notice
published in The Oregonian
Date: 01/09/03 _____

cc: Martha Bennett, Executive Director; Columbia River Gorge Commission
Glenn Fullilove, Land Use Legal Assistant, Friends of the Columbia Gorge
Ken S. Berg, Manager Western Washington Office US Fish and Wildlife Service
Ken Adcock