

# **RECORD OF DECISION**

for

## **SOUTH GEORGE VEGETATION AND FUELS MANAGEMENT PROJECT**

**USDA Forest Service  
Umatilla National Forest  
Pomeroy Ranger District  
Asotin and Garfield Counties, Washington**

**Legal Location:** Portions of T.7N., R.43E., sections 1-2; T.7N., R.44E., sections 1-6 and 10-11; T.8N., R.43E., sections 1-2, 10-15, 21-28, 33-36; T.8N., R.44E., sections 5-8, 17-23, 25-36; and T. 9N., R.43E., section 35; and T9N., R44E., section 31 W. M. surveyed.

### **INTRODUCTION**

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This Record of Decision (ROD) documents my decision and rationale for selecting a course of action to be implemented for South George Vegetation and Fuels Management Project. I have considered the analysis that is documented in the final environmental impact statement (FEIS) for South George Vegetation and Fuels Management Project, information in the project file, and input received from the public during the course of the National Environmental Policy Act (NEPA) analysis of this project.

This ROD was developed according to requirements of the National Environmental Policy Act (NEPA), the Council of Environmental Quality's implementing regulations (40 CFR 1500-1508), Forest Service NEPA regulations (36 CFR 220), and Forest Service policy in Forest Service Manual 1900, Chapter 1950, and Forest Service Handbook 1909.15.

### **LOCATION AND AREA**

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South George Vegetation and Fuels Management Project planning area (approximately 21,000 acres) is located on Pomeroy Ranger District in South Fork Asotin Creek and Upper George Creek Subwatersheds of Asotin Watershed. See attached vicinity map.

South George project planning area is bounded by Umatilla National Forest boundary to the north and east, Smoothing Iron Ridge to the north, and breaks of the Grande Ronde River to the south. Asotin Creek and Wenatchee Creek inventoried roadless areas (IRAs) are near the west and south sides of the project planning area. Existing main access forest system open roads, Forest Roads (FR) 4400, 4300, and 4304, separate both IRAs from the project planning area boundary.

## DECISION

Based on my review of the environmental analysis disclosed in South George Vegetation and Fuels Management FEIS, project file, and consideration of public comments received on the draft environmental impact statement (DEIS), I have decided to implement Alternative B-Modified.

Following are the selected modifications to Alternative B:

- Implementation of helicopter logging in units #1 (approximately 100 acres) and #10 (approximately 158 acres) will be based on economic feasibility at the time of operation. If not economically feasible stand characteristics may still be manipulated by other methods such as manual thinning and burning. This strategy will only be implemented if the remaining stand structure can be properly protected to maintain other resource values. This also will result in less temporary road construction (approximately 0.64 miles).
- Decommissioning of approximately 31 miles of system roads (approximately 4.3 miles of seasonal open roads and 26.6 miles of closed roads as listed in the FEIS Appendix G, Table G-3) upon completion of project activities and availability of funding<sup>1</sup>.
- Any unauthorized non-system roads or trails located in harvest units will have entry areas made impassable after harvest activities.
- Hogback Road, Forest Road (FR) 4302 will have the existing seasonal closure extended annually from September 15 to November 30th and will change from an operational maintenance level 3 (passenger vehicle) to operational maintenance level 2 (high clearance vehicle).

Implementing Alternative B-Modified will result in the following activities:

**Table 1 – Summary of Activities – Alternative B-Modified (Selected Alternative)**

| ACTIVITY   | Alternative<br>B-Modified<br>(**Units of Measure) |
|--|---|
| <b>Fuels Treatments – Activity Fuels</b>                     |   |
| Mechanical Grapple Piling/Pile Burning                       | 870 acres   |
| Prescribed burning of activity fuels (Jackpot and Broadcast) | 2,030 acres                                       |
| <b>Total</b>   | <b>3,000 acres</b>                                |
| <b>Fuels Treatments – Natural Fuels</b>                      |   |
| Non-commercial mechanical thinning and ladder fuel removal   | 800 acres   |
| Non-commercial manual thinning and ladder fuel removal       | 350 acres   |
| Landscape prescribed fire                                    | 3,000 acres                                       |
| RHCA non-commercial mechanical fuels treatment               | 25 acres  |
| <b>Total</b>   | <b>4,175 acres</b>                                |
| <b>Vegetation Removal</b>                                    |   |
| Intermediate Harvest: Improvement Cut                        | *3,020 acres                                      |
| Intermediate Harvest: Low Thinning                           | 80 acres  |
| Regeneration Harvest: Seedtree w/reserves                    | 550 acres   |
| Regeneration Harvest: Clearcut w/reserves                    | 250 acres   |
| <b>Total</b>   | <b>3,900 acres</b>                                |

<sup>1</sup> These roads to be decommissioned are not connected actions to the commercial timber harvest activity and will require separate funding (FEIS, Chapter 2, page 2-26).

| ACTIVITY  | Alternative<br>B-Modified<br>(**Units of Measure) |
|---|---|
| Volume of timber removed  | 47,250 CCF  |
| <b>Logging Methods</b>  |   |
| Helicopter  | *300 acres  |
| Skyline   | 850 acres   |
| Conventional Ground Based (tractor or skidder)  | 2,750 acres                                       |
| <b>Total</b>  | <b>3,900 acres</b>                                |
| <b>Roads Used – Haul Routes</b>   |   |
| Seasonal Open System – Maintenance level 3  | 33 miles  |
| Seasonal Open System – Maintenance level 2  | 13.5 miles  |
| Closed System – Maintenance level 1   | 32.5 miles  |
| <b>Total</b>  | <b>79 miles</b>                                   |
| <b>Other Road Activity</b>  |   |
| New temporary road construction – decommissioned post project activities  | *3 miles  |
| System roads decommissioned (FEIS, Appendix G, Table G-3)   | ***31 miles                                       |
| Extension of Seasonal Closure on Hogback road , FR 4302 annually from September 15 to November 30   | Yes   |
| Danger tree removal   | As Needed   |
| <b>Economics</b>  |   |
| Total Timber Value at Predicted High Bid Rate (Revenue)   | \$2,315,250                                       |
| *Units #1 and #10 (approximately 258 acres in total) will not be harvest if not economically feasible at the time of operation. Vegetation may be manipulated by manual methods and burning, with no commercial removal of timber.<br>**Units of Measure – Acres, miles, CCF, and dollars are approximate<br>*** Implementation will be dependent on funding not associated with a timber sale package. |   |

As part of my decision, I will implement project-specific design features and management requirements identified in the FEIS (Chapter 2, Table 2-5, pages 2-19 to 2-25) and best management practices (BMPs) listed in Appendix D of the FEIS. Project design elements were developed by the interdisciplinary team to reflect existing direction found in Umatilla National Forest’s Land and Resource Management Plan (Forest Plan), this includes measures for PACFISH, Eastside Screens, and Invasive Plant Program (FEIS, Chapter 1, p. 1-11) and program direction established on Umatilla Forest. These design elements include all practical means of avoiding or minimizing environmental harm from management activities, and implementation of these design elements is considered highly effective.

I will also implement monitoring measures and effectiveness measures as disclosed in the FEIS (Chapter 2, page 2-25) to assure that attributes of my decision are carefully tracked during and after implementation.

## BACKGROUND

An analysis of existing and historical vegetation (FEIS, Appendix J, pages J-1 to J-15) has indicated that active management is warranted for upland forests in South George project planning area. High levels of insect and disease susceptibility, caused largely by overly dense forests containing low vigor trees, are

symptoms of impaired forest health and deteriorating ecosystem integrity (FEIS, Appendix J, pages J-15 to J-24). These symptoms relate to changes in three vegetation components: species composition, forest structure (including canopy layering), and tree density (including canopy biomass) in the project planning area.

Forest stand composition, density, and structure in the project planning area have been altered from historical conditions due to fire suppression and other past forest management practices. A majority of current forest stands originated as a result of fire disturbances occurring up to the 1930s, and have not experienced fire since then. Late seral tree species have become dominant after long periods without disturbance and are more susceptible to disturbance-caused mortality, wildfire, and insects and diseases than early seral species. Overall forest health has generally declined due to overstocking and an increase in the amount of shade tolerant species (FEIS, Chapter 1, page 1-3).

Findings from the existing and historical vegetation analysis (FEIS, Appendix J, pages J-1 to J-15 and Silviculture Specialist's Report pages 75 to 97) for upland forests in South George project are listed below.

Dry forests sites currently have the following issues, concerns, or opportunities with respect to forest vegetation conditions:

- Dry forest sites currently support too much of the grand fir and Douglas-fir cover types, and too little of the ponderosa pine cover type.
- Dry forest sites currently support too much of the understory reinitiation structural stage, and too little of the stand initiation and young forest multi strata structural stages.
- Dry forest sites currently support too much high-density forest condition, and too little of the low-density condition.
- For the dry upland forest biophysical environment, both late-old structural stages are within historical range of variability (HRV), so Scenario B from the wildlife standard in the Eastside Screens (amendment #11 to the Forest Plan) is to be followed for this biophysical environment (see FEIS, Appendix C for Consistency with Eastside Screens).

Moist-forest sites currently have the following issues, concerns, or opportunities with respect to forest vegetation conditions.

- Moist-forest sites currently support too much of the grand fir and spruce-fir cover types, and too little of the lodgepole pine, western larch, broadleaved trees, and Douglas-fir cover types.
- Moist-forest sites currently support too much of the stem exclusion open canopy and old forest single stratum structural stages, and too little of the young forest multi strata and old forest multi strata structural stages.
- For the moist upland forest biophysical environment, one of the late-old structural stages is above HRV and the other is below HRV, so Scenario A from the wildlife standard in the Eastside Screens (amendment #11 to the Forest Plan) is to be followed for this biophysical environment (see FEIS, Appendix C for Consistency with Eastside Screens).

Fire regime Condition Classes, which describe departure from historical fire regimes in terms of fire return intervals and vegetative change from historical composition and density, have been modified in the project planning area due mainly to past harvest history and fire suppression (FEIS, Chapter 3, pages 3-78 to 3-86). In many areas fuels that would have historically been consumed during periodic wildfires have increased above historical levels. Today, fires in dry and moist forests would exhibit moderate to severe effects characterized by high fire severity and intensity on landscapes that historically had low to mixed severity.

Without treatment, South George project planning area would continue to transition from a low or moderately altered fire regime (Condition Classes 1 and 2), to a significantly altered fire regime (Class 3), where the risk of losing ecosystem components would be substantially higher. Surface fuel loads would continue to build and tree density and canopy layering would also increase. Abundant small trees would serve as ladder fuels that can carry fire from the forest floor to the tree canopy, increasing the likelihood of high severity, stand-replacement fires. Fire ignitions today would not function as a natural disturbance process within their historical range pertaining to fire size, frequency, intensity, severity, or landscape patterns.

### **PURPOSE AND NEED**

Based upon current vegetative and fuel trends that are outside their historical range of variability in South George project planning area, and contrasting them with desired future conditions identified in Umatilla National Forest Land and Resource Management Plan (Forest Plan, pp. 4-3 to 4-14), and including recommendations made in the Asotin Watershed Assessment (pages VI-1 to VI-3) the following needs were identified (FEIS, Chapter 1, page 1-5):

- Move forest structure, species composition, and stand density toward their historical ranges of variability (HRV), because by moving these forest attributes toward HRV, ecosystem processes, such as response to wildfire, insects, and disease are more resilient and self-sustaining (Egan and Howell 2001, Holling and Meffe 1996, Kaufmann et al. 1994).
- Manage forest stands in Condition Classes 2 and 3 to begin transitioning vegetation characteristics and fire return intervals characteristic of historical fire regimes, because this would reduce fuel loads to levels expected under natural fire disturbance regimes and decrease the probability of uncharacteristic high intensity wildfires.
- Provide sawlogs and wood fiber to assist in meeting regional and local economic needs.
- Continue to provide and manage, over time, for wildlife habitat and its components (cover and forage) because the majority of acres (about 18,700 acres) in the project planning area are Forest Plan management area allocations (C3, C3A, and C4) with big game and wildlife habitat goals (FEIS, Chapter 1, page 1-6).

South George Vegetation and Fuels Management Project final environmental impact statement (FEIS) documents the environmental analysis of three (3) action alternatives to address these needs.

## **DECISION RATIONALE**

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I have reviewed South George Vegetation and Fuels Management Project FEIS. Information in the project file shows a thorough review of relevant scientific information, a consideration of responsible opposing views, the acknowledgement of incomplete or unavailable information, scientific uncertainty and risk; the Forest Plan; applicable laws (FEIS, Chapter 3, pages 3-188 to 3-191); regulations (40 CFR parts 1500 to 1508, and 36 CFR part 220); and Forest Service policies.

In making my decision I considered and compared how each alternative addresses the stated purpose and need (FEIS, Chapter 2, Table 2-12, pages 2-36 to 2-39), how each alternative responds to identified environmental issues (FEIS, Chapter 2, Table 2-13, pages 2-40 to 2-47), and I have taken into consideration public comments submitted during the 45-day comment period on the DEIS along with our responses to those comments (FEIS, Appendix K, pages K-1 to K-258).

## **RESPONSE TO PURPOSE AND NEED**

Implementing Alternative B-Modified will make significant progress in moving the project planning area toward historical vegetative and fuel conditions. I find that all action alternatives (B, C, and D) address the project objectives, but to different extents with different effects and trade-offs. Alternatives B and C are most similar with the exception that Alternative C has no temporary road construction, decommissions about 31 miles of roads, and more acres would be harvested using helicopter logging (costlier than conventional ground based or skyline logging). Alternative D has fewer acres of harvest activity than Alternatives B and C.

I considered the potential outcome to this area if I had selected no action. I concluded that by acting now to reduce stand densities and alter structure and species composition, future stand and habitat conditions within South George project planning area will improve. Activities including fuels reduction, reintroduction of fire to the landscape, and danger tree removal will also benefit South George project planning area. I believe I have chosen the best course of action to meet the needs we have identified for land management. Implementing Alternative B-Modified will make important progress in moving the area toward desired historical conditions for vegetation and fuels and will continue to provide for wildlife habitat and contribute to regional and local economies.

I find that Alternative A, the no action alternative, fell short of addressing the purpose and need for action and it would be an irresponsible course of action to do nothing.

Based on the following purpose and need statements and considerations listed below, I have confidence that my decision to select Alternative B-Modified for implementation affirmatively addresses and fulfills the purpose and need for action, and is responsive to comments received on the DEIS and consistent with Forest Plan goals identified in the FEIS, Chapter 1, page 1-5. A quantitative summary comparison of how each alternative considered in detail responded to the purpose and need is located in the FEIS, Chapter 2, Table 2-12, pages 2-36 to 2-39.

- **Move forest structure, species composition, and stand density toward their historical ranges of variability (HRV).**

Species composition - Before implementation dry upland forest potential vegetation groups (PVG) had 3 cover types outside of HRV and moist upland forest PVG had 6 cover types that were outside of HRV (FEIS, Chapter 3, Table 3-18, page 3-49). After implementation dry upland forest PVG will have 2 cover types outside of HRV and moist upland forest PVG will have 5 cover types that are outside of HRV (FEIS, Chapter 3, Table 3-26, page 3-57). In dry forest the amount (acres and percentage) of Grand fir will be reduced and Ponderosa pine will be increased. In moist forest the amount (acres and percentage) of Grand fir and spruce fir will be reduced and Douglas fir and Western larch will be increased after implementation.

Structural stages - Before implementation dry upland forest PVG had 4 structural stages that were outside of HRV and moist upland forest PVG had 5 structural stages that were outside of HRV (FEIS, Chapter 3, Table 3-20, page 3-50). After implementation dry upland forest PVG has 2 structural stages that are outside of HRV and moist upland forest PVG has 4 structural stages that are outside of HRV (FEIS, Chapter 3, Table 3-29, page 3-59). In dry forest sites the amount of understory reinitiation structural stage will decrease, stand initiation will increase, and young forest multi strata structural stage will remain the same after implementation. In moist forest sites the amount of old forest single stratum and old forest multi strata will increase and young forest multi strata will stay the same after implementation.

Tree Density - Before implementation dry upland forest PVG had 2 tree density classes that were outside of HRV and moist upland forest PVG had no classes that were outside of HRV (FEIS, Chapter 3, Table 3-22, page 3-51). After implementation dry upland forest PVG has 1 tree density class that is outside of HRV and moist upland forest PVG has 2 tree density classes that are outside of HRV (FEIS, Chapter 3, Table 3-32, page 3-61). Both dry and moist forest stands will decrease in the amount of acres in high density and will increase the amount of acres in low density.

As identified in the FEIS, Chapter 1, page 1-5, there is a need to move forest structure, species composition, and stand density toward their historical ranges of variability (HRV), because by moving these forest attributes toward HRV, ecosystem processes, such as response to wildfire, insects, and disease are more resilient and self-sustaining (Egan and Howell 2001, Holling and Meffe 1996, Kaufmann et al. 1994).

If no silvicultural activities were implemented to begin move existing conditions closer to desired conditions, then existing forest vegetation within the project planning area will remain overly dense and continue to be dominated by mid- and late-seral stages of species composition. Old forest (late-old) structure on moist-forest sites will continue to be deficient because proposed activities will not be used to increase tree growth and thereby promote large-diameter trees (trees whose diameter is 21 inches or greater), or to reduce stand density sufficiently for establishment of a new cohort (stratum) of understory trees (FEIS, Chapter 3, page 3-55).

- **Manage forest stands in Condition Classes 2 and 3 to begin to restore vegetation characteristics and fire return intervals characteristic of historical fire regimes.**

My decision to implement fuel treatments in Alternative B-Modified is based on the comparison of existing condition classes 1, 2, and 3 acres versus acres in these condition classes after implementation of project activities. Alternative B-Modified will reduce more acres in condition classes 2 and 3 than Alternative D.

**Table 2 – Condition Class Acres and Percent**

| Existing Condition Alternative A |        |         | After Implementation Alternatives B and C |        |         | After Implementation Alternative D |        |         |
|----------------------------------|--------|---------|---|--------|---------|------------------------------------|--------|---------|
| Class                            | Acres  | Percent | Class                                     | Acres  | Percent | Class                              | Acres  | Percent |
| 1                                | 65     | <1%     | 1   | 7,950  | 39%     | 1                                  | 5,170  | 24%     |
| 2                                | 17,940 | 87%     | 2   | 10,480 | 52%     | 2                                  | 13,295 | 65%     |
| 3                                | 2,550  | 13%     | 3   | 2,065  | 10%     | 3                                  | 2,100  | 10%     |

- **Provide sawlogs and wood fiber for utilization by regional and local economies.**

Alternative B-Modified has the least cost per acre, and the highest value per hundred cubic feet (CCF) above base rates of all action alternatives (FEIS, Chapter 3, Table 3-80, page 3-174). Alternative B-Modified maximizes the economic benefits (jobs and dollars) to the regional and local economy; therefore, there will be more trust funds (Knutson-Vandenberg) available for sale area improvements to resources in the area following the completion of timber harvest (FEIS, Chapter 2, pages 2-32 to 2-33). Estimated volume of timber to be harvested by implementing Alternative B-Modified is approximately 47,250 hundred cubic feet (CCF) (FEIS, Chapter 2, Table 2-11, page 2-35). Although the acres to be harvested are the same for Alternative C the above base rate is lower because Alternative C was designed to not have any temporary road construction and more harvest units

would use helicopter logging which is costlier than skyline and conventional ground based (tractor or skidder) logging. To maximize the economic benefit the possibility of utilizing stewardship contracting will add another tool for consideration.

- **Continue to provide and manage, over time, for wildlife habitat and its components (cover and forage).**

The majority of acres (about 18,700 acres) in South George project planning area are in Forest Plan management area allocations with big game and wildlife habitat goals (C3, C3A, and C4). There will be no timber harvest in management areas C1 (only landscape prescribed fire), C3A, and A6. Timber harvest and landscape prescribed fire will occur in management areas C3, C4, and C5 (FEIS, Chapter 1, page 1-8). Continuing to provide for big game and wildlife habitat in the project planning area contributed to my decision in selecting Alternative B-Modified.

By implementing Alternative B-Modified satisfactory cover in management area C3 will be 12 percent which is above the Forest Plan standard of 10 percent and in management area C4 satisfactory cover will be 19 percent which is above the Forest Plan standard of 15 percent. Forage will be improved by implementing landscape prescribed fire. Upon completion of each burn area there would be a mosaic of unburned, lightly burned, moderately burned, and intensely burned patches. As green-up occurs the following spring and summer the area will be highly palatable and rich in nutrients for wildlife (FEIS, Chapter 3, page 3-107). Based on this information, I accept the trade-off that satisfactory cover will decrease in both management areas, but that it is still will be above Forest Plan standards and generally all intermediate harvest will maintain marginal cover characteristics, and we will continue to provide for wildlife habitat in the project planning area now and in the future.

Another factor I considered was the habitat effectiveness index (HEI) for elk. HEI for management areas C3 and C4 will continue to be above Forest Plan standards after completion of project activities (FEIS, Chapter 2, Table 2-13, page 2-43).

By implementing Alternative B-Modified there will be a longer seasonal closure for wildlife security on the Hogback road FR 4202, and approximately 31 miles of system roads will be decommissioned after project activities and when funding becomes available (roads listed in the FEIS, Appendix G, Table G-3) for decommissioning. These roads are not connected actions to the commercial harvest activity and will require separate funding to be decommissioned.

## **RESPONSE TO ISSUES**

Issues and concerns were raised by various environmental groups, Federal agencies, Washington State agencies, timber industry representatives, and individuals during the development of this project. I reviewed and considered their comments and concerns in making my decision.

The interdisciplinary team identified two key issues (old forest habitat and access management) which were used to develop alternatives to the proposed action. More detailed information concerning issues can be found in the FEIS, Chapter 2, pages 2-2 to 2-6, and in Chapter 3. For a summary of comparison of effects by indicators selected for key issues and other resource issues see FEIS, Chapter 2, Table 2-13, pages 2-40 to 2-47.

In Chapter 3 of the FEIS, I observed that environmental effects for many resource topics did not vary by alternative, or only varied in minor ways and the intensity of the predicted effects may be limited in time or extent, or minimal altogether. Because of this, those resource issues influenced my decision in minor ways and are not discussed in detail in this decision document. Following are the resources in Chapter 3 of the FEIS not discussed in detail in this decision: Invasive Plants (pages 3-147 to 3-148); TES Plants

(pages 3-150 to 3-151); Range (pages 3-154 to 3-155); Recreation (pages 3-157 to 3-159) and Visual Resources (pages 3-166 to 3-170).

I recognized that the public was passionate about what they felt was best for the land, and that there is no single management strategy that could totally satisfy all concerns expressed about the South George project. I have selected a modified alternative that addresses concerns expressed, but is not likely to resolve conflicting points of view. The resource issues most relevant to me in making my decision are discussed below.

**Old Forest (Key Issue)** – Comments and concerns regarding old forest were expressed early in the development of the project. This concern was used to develop an alternative to the proposed action (Alternative D). Some respondents surmised that past timber harvest, other management actions and insect and disease epidemics have reduced the amount and connectivity of old forest stands in South George project planning area. Harvest and fuels reduction treatments can have the potential to change forest stand structure and composition over a large area. This may have positive effects for some wildlife species and negative effects for others.

If I selected Alternative A, the no action alternative, and no proposed activities were implemented, the area will continue to develop dense, multi-storied stands with forest composition continuing to shift towards fire intolerant species dominance. Where dry forest stands continue to have fir encroachment, they will be less attractive for use by species that prefer open pine stands. Tree disease and insect infestations could reduce old forest and connectivity corridors in the mid and long-term (FEIS, Chapter 3, page 3-100).

Alternative B-Modified does include timber harvest (logging) in old forest, application of regeneration cutting methods (clearcutting with reserves; seed-tree cutting with reserves), and harvest methods on steep slopes (skyline and helicopter systems). This activity will move forest structure, species composition, and stand density toward their historical ranges of variability (FEIS, Chapter 1, pp. 1-4 to 1-5). I am aware that timber harvest occurring in old forest does not change the status of those areas from old forest to a different structural stage that is not old forest. As described in the FEIS (Chapter 3, page 3-58) “Although some of the existing old-forest stands (OFMS and OFSS) would be affected by proposed silvicultural activities in these alternatives, the overall amount of old forest is expected to increase after implementation because of the following reasons:

- Only improvement cutting is proposed for existing old-forest stands, and the post-treatment structural stage remains old forest because improvement cutting does not remove large-diameter trees.
- Improvement cutting is used to transform certain stands of stem exclusion or understory reinitiation to old forest when they have a sufficient number of large-diameter trees (10 or more per acre that are 21-inches or larger in diameter) to qualify as old forest after treatment.”

The Forest Service is certainly concerned about the sustainability of old, large-diameter trees in response to stressors such as insects or disease. Alternative B-Modified’s stand density metrics, as designed for understory treatments in old forest stands, will properly account for stressors by removing enough of the smaller trees to improve the survivability of the large old trees.

**Access Management (Key Issue)** –During scoping a number of respondents were concerned with the proposal of temporary road construction for project activities and the desire for system road decommissioning. Alternative C was designed to respond to this issue. Comments on the Draft EIS from Washington State Department of Fish and Wildlife and others once again requested that additional system roads and unauthorized trails be considered for decommissioning. There was also a request for an extension to the seasonal closure in the Hogback area to offer additional protection for wildlife. In

response to these comments I am including the approximately 31 miles of system road identified for decommissioning in Alternative C to be included in Alternative B-Modified, and any unauthorized roads or trails located in harvest units will be manipulated, after project activities are completed, to make entry areas impassible. I have also decided for Alternative B-Modified to extend the seasonal closure annually on the Hogback Road FR 4202 to begin September 15, approximately a month earlier than currently exists, and to remain closed until November 30.

If harvest units #1 and #10 are not harvested, approximately 0.64 miles of temporary road construction will not occur.

**Soils** - We received comments expressing concern of impacts to soils due to project activities. I share that concern, and have decided to fully implement the design features and management requirements (FEIS, Chapter 2, Table 2-5, pages 2-19 to 2-25) that were recommend by the Forest Soil Scientist and other interdisciplinary (ID) team members. These features include tailored fuel treatments and applicable best management practices (BMPs) listed in Appendix D of the FEIS. I am confident that these site-specific design features will address and lessen impacts to soil productivity.

Past monitoring of harvest activities on our forest indicate these design features will effectively limit ground disturbing activities on sensitive soils (FEIS, Chapter 3, pages 3-9 to 3-14). Post-activity analysis of effects indicated that no activity units will exceed detrimental soil condition (DSC) standards as identified in the Forest Plan (FEIS, Appendix E, Table E-6). The cumulative effects to DSC are fully consistent with Forest Service policy (FEIS, Chapter 3, page 3-14). Based on this information, I accept the trade-off of harvesting more acres than proposed in Alternative D to better meet the purpose and need, knowing that adequate soil protection measures are in place to meet Forest Plan standards.

**Hydrology** - During the comment period some commenters wrote that they were concerned that commercial harvest, temporary road construction, road use, and prescribed burning would degrade water quality. Hydrologic processes and effects to water quality were considered and disclosed in the FEIS (Chapter 3, pages 3-14 to 3-32). As with soils, all action alternatives were developed with design features (FEIS, Chapter 2, Table 2-5) and site-specific BMPs (FEIS, Appendix D) to lessen impacts to water quality. Past monitoring (FEIS, Chapter 3, page 3-31) demonstrates that Forest Service personnel have been successful in implementing best management practices, PACFISH standards, and skidding guidelines for disturbed soils. These measures effectively limit unwanted effects to water quality. Cumulative effects disclosed in the FEIS indicate that activities to be implemented in Alternative B-Modified are fully consistent with all applicable State and Federal water quality standards, and the Clean Water Act (FEIS, Chapter 3, pages 3-31 to 3-32).

Project activities have been designed and mitigated to prevent or minimize damage to ground cover, erosion, and sedimentation (FEIS, Chapter 2, Table 2-5). The North Zone Hydrologist found that project activities identified in Alternative B-Modified offer no opportunity for measurable cumulative effects to hydrologic function and condition, water quality, and water yield with ongoing actions and future foreseeable actions (FEIS, Chapter 3, pages 3-26 to 3-28).

Using common estimates of 2 acres per mile of road, approximately 31 acres of current road beds would be rehabilitated to improve soil condition, erosion potential, and improve vegetative cover. With implementation of Alternative B-Modified, hydrologic function and condition will improve over the existing condition and over Alternatives B and D as road decommissioning (and any unauthorized roads or trails located in harvest units will have entry ways made impassible) is accomplished. These improvements would be related to improved infiltration on nearly 100 acres of currently compacted lands, decreased risks of erosion and soil damage. Reductions in hydrologic connectivity would reduce risks associated with sedimentation and drainage network expansion (FEIS, Chapter 3, page 3-29).

**Threatened, Endangered, and Sensitive (TES) and Management Indicator (MIS) Aquatic Species**

Project activities of timber harvest and fuel treatments have the potential to affect aquatic species and habitat. South George project planning area contains about 21,000 acres with three fish bearing subwatersheds. South Fork Asotin and Upper George Creeks are classified as a Class I (anadromous), third order streams, which presently do not have anadromous habitat within National Forest boundaries. Coombs Creek a tributary of George Creek is classified as a Class II (resident), third order stream. The lower end of this stream is important anadromous rearing habitat.

In 1996, PACFISH Interim Guidelines were instituted because of the number of TES aquatic species reaching the point of dangerous decline. Since that determination almost twenty years has passed and nearly thirty years since a major entry into this project planning area. Entry into South George project planning area will protect aquatic habitats with implementation of PACFISH standards (now permanent) reducing any fragmentation and destruction of habitat while ensuring quality habitat natural variability as observed today.

To reduce any potential effects on TES and MIS fish habitat, design features and management requirements were developed (FEIS, Chapter 2, Table 2-5, pages 2-19 to 2-25) and are included in all action alternatives. A summary of biological determination findings for listed species, management indicator species (MIS), and sensitive species (Regional Forester's list) can be found in the FEIS, Chapter 3, page 3-45. This project adequately avoids, minimizes, or otherwise offsets any potential effect to designated Essential Fish Habitat and therefore fulfills our requirement under the Magnuson Stevens Act [305 (b) (4) (A)] (FEIS, Chapter 3, page 3-46).

Appendix F of the FEIS contains aquatic ESA compliance documents used for this project. This project incorporates by reference the following (FEIS, Chapter 1, page 1-12):

- *Blue Mountain Expedited Section 7 Consultation Process and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation;*
- *Bull Trout Critical Habitat Designated in 2010: Letter dated November 16, 2010 from U. S. Fish and Wildlife Service, confirmation of Conference Reports and Conference Opinion as Letters of Concurrence and a Biological Opinion for Multiple Willowa-Whitman National Forest Actions Involving Proposed Bull Trout Critical Habitat; and*
- National Forests in Oregon and Washington received the biological opinions "*Fish Habitat Restoration Activities in Oregon and Washington CY2007-2012 Biological Assessment and associated Biological Opinions, reissued by NMFS on June 27, 2008.*

My decision is in compliance with the Endangered Species Act and the Magnuson-Stevens Fishery Conservation and Management Act.

I am aware that in the short-term time frame (season of disturbance before green-up usually one year), during the seasonal high flows, there is a potential for the introduction of sediment and or other materials to the creek, and that there are other ongoing activities in the area that have been determined to have an effect on critical habitats (i.e., timber harvest, burning, and grazing). At these site specific levels there may be cumulative undesirable effects that could add to effects to downstream critical habitats. I am also aware that with continued completion of restoration activities (i.e. road obliteration, cutslope planting and stabilization, in-channel habitat restoration, reconstruction of the road surface and the culvert replacements) and the continuation of RMO values to improve positively, these effects may be negated. Based on the environmental effects analysis and biological evaluation completed for aquatic species, I have decided to implement Alternative B-Modified knowing that fish and their habitat are protected in the long-term (FEIS, Chapter 3, page 3-44).

**Vegetation** - I am informed that there are differing opinions about managing forests in the western United States, especially management of fire-prone forests. Inconsistent terminology for forest vegetation and fire regime types makes it easy for people to disagree about what is the best science that applies to the forest types in South George project planning area. I recognize that the forest condition brought to light by the vegetation analysis in the FEIS, Chapter 3, pages 3-51 to 3-71 corresponds to changes that are common in landscapes whose development has been changed by fire suppression, that is they are outside of HRV in predictable ways for stand attributes including species composition, stand structure, and stand density (FEIS, Chapter 1, pages 1-3 to 1-4). These forest attributes (structure, composition, density) relate to important forest processes, including wildfire, drought, insects, and diseases.

As discussed above under the heading Purpose and Need, Alternative B-Modified best manages vegetation in South George project planning area to historical and sustainable conditions. I am mindful that implementation of silviculture activities associated with Alternative B-Modified will not result in more of the forest cover types moving within their historical ranges, because of the following reasons:

1. A relatively low proportion of area (acreage) is being treated, which limits the opportunity to change under- or over-represented forest cover types. Alternative B-Modified only affects 25 percent of the forested portion of the planning area, and only 28 percent of the forest vegetation affected environment (FEIS, Chapter 3, Table 3-16, page 3-47). Since vegetation treatments must be closely coordinated with other resource objectives such as wildlife, water quality, fish habitat, etc., I believe that a reasonable percentage of area will be treated and will provide the best balance for all resources in South George project planning area.
2. Proposed silvicultural activity units cannot generally address every indicator simultaneously; very few individual units address all three of the forest vegetation indicators (composition, structure, density) concurrently, so certain activity units directed toward one indicator (composition) may have a neutral or negative effect on another indicator (structure or density), depending on a unit's suitability for addressing indicators, and on priority setting between units (FEIS, Chapter 3, page 3-62).

Based on this information, I recognized that more individual stands will show a greater trend toward improvements in species composition, forest stand structure, and forest stand density by implementing Alternative B-Modified than Alternatives D (FEIS, Chapter 2, Table 2-12, pages 2-36 to 2-38).

**Fuels and Air Quality**- Approximately 87 percent of South George project planning area has moved, or is on the threshold of moving, into a Condition Class 2 fire regime, the remaining percentage of acres (approximately 13 percent) are in Condition Class 3. This indicates a transition to more complex fuel conditions than historically were present in the planning area. Fuels that would have historically been consumed during periodic wildfires have increased and in many areas, surface and aerial (within the canopy) fuel loadings are above historical levels (FEIS, Chapter 3, page 3-80, Table 3-47).

Historical wildland fire data shows that very small acreages (less than 120 acres) have burned during the last 40 years in South George project planning area, with respect to fire return frequency, this means at least two fire return intervals have been missed in Fire Regime I and one in Fire Regime III (FEIS, Chapter 3, page 3-80). This absence of fire has resulted in an existing affected environment with increased surface fuel loads with high connectivity, and increased tree density and canopy layering. Increased canopy cover has led to regeneration of shade tolerant, fire intolerant species with low crown bases and heat-trapping foliage. These abundant small trees serve as ladders that carry fire from the forest floor to the canopy, increasing the likelihood of high severity, stand-replacement fires (Huff et al. 1995).

I am aware of the concerns expressed in public comments that thinning increases fire risk. Alternative B-Modified will reduce ladder and ground fuels on more acres than Alternative D. Fuel treatments will be implemented in areas where successful suppression efforts can occur and provide or maintain a network of stands that can be used to control the size and spread of wildfire (FEIS, Chapter 3, pages 3-86 to 3-93).

I have confidence that fuel treatments designed for this project will use fire disturbance to shape forest cover that will be more reflective of the structure and fire intensity associated with historical forest types. Ground fuels will also be reduced to levels that more closely resemble fuel loadings which existed under a natural fire regime.

I am certain that non-commercial mechanical fuel treatments on approximately 25 acres of riparian habitat conservation areas (RHCAs) will help determine effects on future fuel reduction opportunities in RHCAs that may be at risk because of an overabundance of fuels. I believe we are being proactive in using adaptive management for these areas and as stated in Chapter 2 of the FEIS we will be monitoring these areas (FEIS, Chapter 2, page 2-25).

Analysis for effects to air quality show that implementation of any action alternative would remain consistent with the Forest Plan management goal #18 - *to maintain air quality at a level of adequate for protection and use of forest resources and which meets or exceeds applicable Federal and state standards* (FP p. 4-2). Air quality standards would be maintained at a level to meet Washington State and Federal standards (Clean Air Act) through coordination and compliance with Washington State DNR guidelines and approval process. Available predictive and management methods and models will be used to minimize the effects of smoke on any smoke sensitive areas (FEIS, Chapter 3, page 3-97).

**Wildlife Species and Habitat** – Several wildlife issues were presented during public involvement periods such as the effects to TES and MIS species from implementation of project activities.

The environmental effects analysis for wildlife contains a biological evaluation (BE) for all TES wildlife species. The North Zone Wildlife Biologist made a determination the none of the proposed project activities will adversely affect, contribute to a trend toward Federal listing, nor cause a loss of viability to the listed animal populations for sensitive species and will have no effect on Canada Lynx, listed as threatened (FEIS, Chapter 3, pages 3-140 to 3-141).

The analysis for all Forest Plan listed terrestrial MIS (Rocky mountain elk, American marten, pileated woodpecker, northern three-toed woodpecker, and primary cavity excavators) show that the effects to these species is consistent with Forest Plan standards and that continued viability of each of these species is expected on Umatilla National Forest (FEIS, Chapter 3, pages 3-110, 3-113, 3-117, 3-119, and 3-127).

My review of the wildlife analysis also shows that all action alternatives are consistent with the 1918 Migratory Bird Treaty Act (MBTA) and the Migratory Bird Executive Order 13186. The Conservation Strategy for Landbirds (Altman 2000) was reviewed for effects disclosures (FEIS, Chapter 3, page 3-141). Design features such as retention of adequate snags and down logs, retention of live trees, and avoidance of riparian areas proposed in this project will minimize take of migratory birds and meet the intent of current management direction (FEIS, Chapter 2, Table 2-5, pages 2-23 to 2-24).

Based on this site-specific information in the FEIS, Chapter 3, design features in Chapter 2, Table 2-5, and the Wildlife Biologist report (project file), my decision to implement Alternative B-Modified is consistent with applicable laws, regulations, and policy for wildlife species.

**Potential Wilderness Areas and Other Undeveloped Lands** - Comments received were focused on concerns regarding implementation of logging and burning and their associated activities in areas identified by respondents as roadless/unroaded/undeveloped areas and they were concerned with what they consider the critically important role that unroaded areas provide.

During public involvement for this project, and in past similar projects, a wide range of terms have been used by respondents, the courts, and Forest Service when referring to these topics such as roadless, unroaded, uninventoried roadless, undeveloped areas, and roadless expanse. To best address these concerns and terminologies used by respondents, the terminology used for the four resource topics (1) congressionally designated Wenaha-Tucannon Wilderness; (2) inventoried roadless areas (IRAs); (3) potential wilderness areas (PWAs); and (4) remaining other undeveloped lands for this site-specific analysis are defined in the FEIS, Chapter 3, pages 3-177 to 3-179. The four resource topics are based on current law, regulation, agency policy, and the Umatilla Land and Resource Management Plan (Forest Plan), as amended.

A thorough site-specific potential wilderness area (PWA) inventory was completed for this project. This site-specific inventory for potential wilderness areas followed Forest Service procedures (Forest Service Handbook (FSH) 1909.12, Chapter 71). A comprehensive description of the methodology used, detailed information resulting from the inventory, and maps showing sequential steps of the process are located in Appendix H of the FEIS.

Since no project activities will occur within or adjacent to Wenaha-Tucannon Wilderness there will be no effects to wilderness qualities of untrammelled, undeveloped, and natural features (FEIS, Appendix A – Maps).

Asotin Creek and Wenatchee Creek IRAs/PWAs are not part of the environmental effects analysis for this project because both IRAs/PWAs are separated from the project planning area by existing main access forest open system roads (FRs 4400, 4300, and 4304) and no management activities will occur in these IRAs/PWAs. There will be no direct effects from any project activity to either IRA/PWA. Ongoing activities of general road maintenance including removal of danger trees, and existing sights and sounds will continue with usage of these main access roads. Any smoke produced from prescribed fire treatments in the area will comply with Washington State Department of Natural Resources (DNR) Smoke Management Plan (FEIS, Chapter 3, p. 3-97).

There were no PWAs identified within South George project planning area using the PWA inventory process as displayed in the FEIS, Appendix H, Map H-5 and Tables H-1B and H-1C. An outcome of the PWA inventory process found at FSH 1909.12, Chapter 71 was the identification of isolated polygons of other undeveloped lands, approximately 8,785 acres (see Appendix H, Map H-5, Table H-1B). These polygons did not meet inventory criteria as potential wilderness areas and they are not inventoried roadless areas or a designated wilderness area. Each individual polygon of isolated land has no history of harvest activity and does not contain forest roads. They are stand-alone polygons of varying acreages all less than or equal to 4,999 acres within the project planning area (Table H-1B). The process used to identify undeveloped lands is described in Appendix H.

Another factor I considered was that there are no special or unique values associated with the approximate 8,785 acres of other undeveloped areas, and that these acres are not PWAs now, nor will they be in the future, and that all actions implemented on these acres are consistent with Forest Plan standards and guidelines and management area allocations. Any areas with unique ecological values within South George project planning area are currently maintained for those values with Forest Plan standards and guidelines for management area allocations such as C1-Old Growth, C3-Big Game Winter Range, C3A-Sensitive Big Game Winter Range. See Chapter 1, pp. 1-12 to 1-14, for brief descriptions of goals, and

standards and guidelines associated with each Forest Plan management area allocations located within South George project planning area (FEIS, Chapter 3, pp. 3-184 to 3-188).

**Economics** - Some groups felt that the economic analysis in the FEIS was not meaningfully addressed. The economic analysis (FEIS, Chapter 3, pp. 3-170 to 3-175) is in accordance with Forest Service manual and handbook guidance to complete a financial analysis for timber sales (FSH 2409.18). It documents the financial monetary measures for timber and the financial costs of removing the timber. Several economic indicators were used to compare alternatives such as, alternative efficiency which disclosed present net value, benefits to the local economy (jobs), and the sale viability showing value above base rates.

Alternative B-Modified has the least cost per acre of the three action alternatives. The timber harvest in this alternative will maximize the benefits to the regional economy and jobs and total potential income. Trust funds can be expected to fund more vegetative treatment under this alternative. The anticipated value above base rates is positive, so the sale of commercial products is assumed to be viable (FEIS, Chapter 3, Table 3-80, page 3-174).

**Climate Change** - I recognize the agency's responsibility to consider climate change in making a decision to implement a project. I am also aware of climate science that suggests it is difficult to establish a cause-and-effect relationship between proposed actions and climate change at a project scale. Therefore climate change was not made an issue and no indicators were established for comparison of alternatives.

Implementation of Alternative B-Modified will affect approximately 3,900 acres of National Forest System lands by implementing commercial thinning, improvement cutting, seed-tree cutting, clearcutting, and tree planting silvicultural activities. The scope of the action is minor because silvicultural activities are proposed for only 19 percent of the total planning area acreage (FEIS, Chapter 3, Table 3-16, page 3-47), 1.1 percent of the Pomeroy Ranger District, 0.2 percent of Umatilla National Forest, and 0.08 percent of the Blue Mountain national forests (Malheur, Umatilla, Wallowa-Whitman). A project of this magnitude would contribute such minimal amounts of greenhouse gas that its impact on global or national climate change would be infinitesimal. Therefore, with activities implemented in Alternative B-Modified, direct and indirect contribution to greenhouse gasses and climate change would be negligible. In addition, because direct and indirect effects would be negligible, the proposed action's contribution to cumulative effects on greenhouse gasses and climate change would also be negligible (FEIS, Chapter 3, page 3-71).

Based on this information and additional information disclosed in the FEIS, Chapter 3, pages 3-72 to 3-75, I believe that scale of effects from implementing Alternative B-Modified will immeasurable when considered at a global scale.

## **PUBLIC INVOLVEMENT**

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Public involvement for this project began when a description of the project was listed in the 2008 Fall quarterly edition of the Umatilla National Forest's Schedule of Proposed Actions (SOPA). On March 2, 2009, letters describing the project were sent to representatives of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) and Nez Perce Tribe, and to approximately 180 interested individuals, organizations, and other agencies that have indicated an interest in this type of project. The public was invited to comment on this proposed action and any potential conflicts posed by this proposed action. A Notice of Intent (NOI) to prepare an environmental impact statement was published in the Federal

Register on March 9, 2009. The NOI also includes a statement requesting that persons with an interest in this project submit comments. Nine responses were received from public scoping.

On February 24, 2012 the Environmental Protection Agency (EPA) published a notice of availability (NOA) for the draft environmental impact statement (DEIS) in the Federal Register beginning the 45-day comment period. Letters and copies of the DEIS were mailed on February 14, 2012 to interested parties and Federal and Washington State agencies. A legal notice requesting comments on the DEIS was published in the East Oregonian (our newspaper of record) on February 28, 2012.

Thirteen responses were received during the 45-day comment period on the DEIS. Comments were received from environmental organizations, timber industry, Washington State and Federal agencies, and individuals. Copies of their comments, taken directly as stated from their letters on the DEIS, are located in Appendix K of the FEIS, pages K-1 to K-258 (Original letters are located in the project file).

I considered all of the comments received as I made my decision for South George Vegetation and Fuels Management Project.

## ALTERNATIVES CONSIDERED

South George FEIS considered seven alternatives, four were analyzed in detail and three were considered but eliminated from detailed study for reasons stated in the FEIS, Chapter 2, pages 2-33 to 2-34. A detailed description of the four alternatives analyzed in detail can be found in the FEIS, Chapter 2, pages 2-7 to 2-32. A comparison of these alternatives by activity, issues, and purpose and need can be found in the FEIS, Chapter 2, pages 2-35 to 2-47 in Tables 2-11, 2-12, and 2-13. I have determined that there is adequate information to make a reasoned choice among the alternatives that were analyzed in detail.

The following table is a summary of the alternatives considered in detail for this project (see FEIS, Chapter 2 for additional information):

**Table 3 Summary Comparison of Alternatives**

|  | <b>Alternative A</b> | <b>Alternative B</b> | <b>Alternative C</b> | <b>Alternative D</b> |
|--|----------------------|----------------------|----------------------|----------------------|
| <b>Fuels Treatments – Activity</b>                         |                      |                      |                      |                      |
| Mechanical Grapple Piling/Pile Burning                     | 0 acres              | 870 acres            | 870 acres            | 540 acres            |
| RX burning of activity fuels (Jackpot and Broadcast)       | 0 acres              | 2,030 acres          | 2,030 acres          | 1,370 acres          |
| <b>Fuels Treatments – Natural</b>                          |                      |                      |                      |                      |
| Non-commercial mechanical thinning and ladder fuel removal | 0 acres              | 800 acres            | 800 acres            | 800 acres            |
| Non-commercial manual thinning and ladder fuel removal     | 0 acres              | 350 acres            | 350 acres            | 350 acres            |
| Landscape prescribed fire                                  | 0 acres              | 3,000 acres          | 3,000 acres          | 3,000 acres          |
| RHCA non-commercial mechanical fuels treatment             | 0 acres              | 25 acres             | 25 acres             | 25 acres             |
| <b>Vegetation Removal</b>                                  |                      |                      |                      |                      |
| Intermediate Harvest:<br>Improvement Cut                   | 0 acres              | 3,020 acres          | 3,020 acres          | 2,420 acres          |

|   | <b>Alternative<br/>A</b> | <b>Alternative<br/>B</b> | <b>Alternative<br/>C</b> | <b>Alternative<br/>D</b> |
|---|--------------------------|--------------------------|--------------------------|--------------------------|
| Intermediate Harvest:<br>Low Thinning   | 0 acres                  | 80 acres                 | 80 acres                 | 80 acres                 |
| Regeneration Harvest:<br>Seedtree w/reserves  | 0 acres                  | 550 acres                | 550 acres                | 100 acres                |
| Regeneration Harvest:<br>Clearcut w/reserves  | 0 acres                  | 250 acres                | 250 acres                | 0 acres                  |
| Volume of timber removed<br>(CCF – hundred cubic feet)  | 0 CCF                    | 47,250 CCF               | 47,250 CCF               | 25,350 CCF               |
| <b>Logging Methods</b>  |                          |                          |                          |                          |
| Helicopter  | 0 acres                  | 300 acres                | 550 acres                | 300 acres                |
| Skyline   | 0 acres                  | 850 acres                | 625 acres                | 500 acres                |
| Conventional Ground Based (tractor or skidder)  | 0 acres                  | 2,750 acres              | 2,725 acres              | 1,800 acres              |
| <b>Roads Used – Haul Routes</b>   |                          |                          |                          |                          |
| Seasonal Open System – Maintenance level 3  | 0 miles                  | 33 miles                 | 33 miles                 | 33 miles                 |
| Seasonal Open System – Maintenance level 2  | 0 miles                  | 13.5 miles               | 13.5 miles               | 13 miles                 |
| Closed System – Maintenance level 1   | 0 miles                  | 32.5 miles               | 32.5 miles               | 24.5 miles               |
| <b>Other Road Activity</b>  |                          |                          |                          |                          |
| New temporary road construction<br>(All temporary roads will be decommissioned<br>post project) | 0 miles                  | 3 miles                  | 0 miles                  | 2.25 miles               |
| System roads decommissioned(Appendix G,<br>Table G-3))  | 0 miles                  | 0 miles                  | 31 miles                 | 0 miles                  |
| Unauthorized non-system roads and ATV trails<br>decommissioned                                  | 0 miles                  | 0 miles                  | 15 miles                 | 0 miles                  |
| Danger Tree Removal   | Ongoing                  | As needed                | As needed                | As needed                |
| <b>Economics</b>  |                          |                          |                          |                          |
| Total Timber Value at Predicted High Bid<br>Rate (Revenue)                                      | \$0                      | \$2,315,250              | \$1,701,000              | \$1,039,350              |

### **Alternative A (No Action)**

The theme of the No Action alternative was to allow current biological and ecosystem processes to continue with the associated risks and benefits, and to provide a baseline for comparison with other alternatives. With implementation of this alternative, all activities identified in the proposed action would not be approved to occur in South George project planning area. Previously approved ongoing activities such as domestic cattle grazing, fire protection, firewood cutting, recreation, and road maintenance will continue.

### **Reasons for Not Selecting Alternative A (No Action)**

I considered, but did not select Alternative A, the no action alternative. Since no new forest vegetation activities would occur under this alternative, it would not provide an opportunity to address species composition, forest structure, or tree density conditions that are either over-represented or under-represented (i.e., above or below the historical range of variability) (FEIS, Chapter 3, page 3-53). I find that the no action alternative fell short of addressing the stated purpose and need for this project, especially in providing more resilient stands, promoting forest health, providing more wildlife security through decommissioning of illegal roads and trails and treating fuel conditions that are bordering on producing potential uncharacteristic, catastrophic wildfire conditions.

### **Reasons for Selecting Alternative B – Proposed Action and Preferred Alternative**

This is the selected alternative, with modifications discussed above in this document on page 2. The rationale supporting my decision is contained throughout this Record of Decision. I believe that Alternative B-Modified best balances the purpose and need, protects the environment, and is responsive to comments received.

### **Reasons for Not Selecting Alternative C**

Both alternatives (B-Modified and C) considered and applied current science in developing design features with the intent to lessen negative effects to the environment. Current science (FEIS, Literature Citations) was also used to help predict the effects to the environment, and the FEIS clearly discloses the positive and negative effects of all alternatives in Chapter 3. Considering these details, I believe Alternatives B-Modified and C would provide sufficient safeguards to protect the environment from unnecessary degradation. I recognize Alternative C does address the purpose and need but results in higher harvest costs because of no temporary road construction and costlier harvest methods (helicopter). It is very important for the American public to receive the best service at the most economical level. Alternative C does not provide that opportunity.

### **Reasons for Not Selecting Alternative D**

I considered but did not select Alternative D because it is not as responsive to the need to improve species composition, forest structure, tree density conditions, and condition classes 2 and 3 fuels. I do recognize that Alternative D does address the purpose and need, but in a lesser degree than Alternatives B-Modified and C. Alternative D would move the fewest acres toward HRV. Additionally this Alternative would result in the fewest dollars going into the regional and local economy and fewer jobs would be created, approximately 75 versus about 140 jobs with implementation of Alternative B-Modified (FEIS, Chapter 3, Table 3-80, page 3-174).

It is my judgment that Alternative B-Modified represents the best choice of providing the most landscape level treatments while also providing for effective resource stewardship and protection. I fully understand that this decision may not be in agreement with all publics. I also weighed, very heavily, any and all possible environmental effects that this decision will not result in a “pick and pluck” project. In other words our actions will provide the proper treatments at the appropriate scale. This allows us to defer future vegetative treatment for a longer period of time within South George project planning area.

### **Reasons for Not Selecting Other Alternatives**

I considered three additional alternatives for this project (Alternatives E, F, and G). Some of the alternatives were requested for consideration by the public during request for comment periods. See the FEIS, Chapter 2, pages 2-33 to 2-34 for reasons why these alternatives were considered but eliminated from detailed study, and Appendix K for our responses to comments.

## **FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS**

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**National Historic Preservation Act** - Heritage resource surveys were conducted to locate cultural sites and gather the information necessary to evaluate historic properties. Identified sites and any newly recorded sites will be protected (FEIS, Chapter 2, Table 2-5) from all project activities associated with the South George Vegetation and Fuels Management Project. A Project Review for Heritage Resources under the terms of the 1997 Programmatic Agreement between ACHP, SHPO, and USFS R6, has been completed (project file). A No Adverse Effect concurrence determination, including avoidance and mitigation measures, was made on 2/14/12.

**Endangered Species Act (ESA) and Regional Forester's Sensitive Species List** - Environmental effects of implementing the selected alternative are in compliance with the ESA and Regional Forester's Sensitive Species list. The Endangered Species Act requires protection of all species listed as "Threatened" or "Endangered" by Federal regulating agencies (Fish and Wildlife Service and National Marine Fisheries Service).

Biological Evaluations have been completed for all Threatened, Endangered and Sensitive (TES) aquatic, terrestrial wildlife, and plant species. Details are found in the FEIS, Chapter 3 in the TES and MIS Aquatic section (page 3-45), Wildlife (pages 3-140 to 3-141), TES Plants (page 3-151), and Appendix F – Aquatic ESA Compliance.

The FEIS incorporated by reference the following:

- Blue Mountain Expedited Section 7 Consultation Process –Letter dated September 29, 2009 from Level 1 Team Agreement (U.S. Forest Service, NOAA Fisheries, and U. S. Fish and Wildlife Service) tiering to Letters of Concurrence for the Blue Mountain Expedited Section 7 Consultation Process (Blue Mountain Project Design Criteria (PDC)) received from Fish and Wildlife Service, June 4, 2007 and NOAA Fisheries dated May 31, 2007. Level 1 Team letter also fulfills requirements for Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation. This expedited process was used for South George project (see FEIS, Appendix F).
- National Forests in Oregon and Washington received the biological opinions “Fish Habitat Restoration Activities in Oregon and Washington CY2007-2012 Biological Assessment and associated Biological Opinions, reissued by NMFS on June 27, 2008: NMFS BO (FS 2008/03505), FWS BO (13420-2007-F-0055)” (referenced as ARBO). To address the 2010 designation of bull trout critical habitat, the ARBO for FWS was reinitiated by the Forest Service, and a resulting Biological Opinion and Letter of Concurrence dated April 26, 2011 on the Programmatic Aquatic Habitat Restoration Activities in Oregon and Washington that Affect ESA-Listed Fish, Wildlife, and Plant Species and Their Critical Habitats (TAILS #13420-2011-F-0129) was released (see FEIS, Appendix F).

**Clean Air Act** - Implementation of any action alternative would remain consistent with the Forest Plan management goal to maintain air quality at a level of adequate for protection and use of forest resources and which meets or exceeds applicable Federal and state standards (FP p. 4-2). Air quality standards would be maintained at a level to meet Washington State and Federal standards (Clean Air Act) through coordination and compliance with Washington State Department of Natural Resources (DNR) guidelines and approval process. Available predictive and management methods and models will be used to minimize the effects of smoke on any smoke sensitive areas (FEIS, Chapter 3, page 3-97).

**Clean Water Act** – South George Vegetation and Fuels Management Project is in compliance with the Clean Water Act with implementation of any action alternative (FEIS, Chapter 3, pages 3-31 to 3-32). Design features (FEIS, Chapter 2, Table 2-5) and site-specific best management practices (BMPs) (FEIS, Appendix D) will control disturbance that could lead to erosion and sedimentation.

**Prime Farmland, Range Land, and Forest Land** - No adverse effects on any prime farmland, range land, and forest land not already identified in the Final FEIS for the Forest Plan will be expected to result from implementation of the selected alternative (FEIS, Chapter 3, page 3-189).

**Civil Rights, Women, and Minorities** - No adverse effects on civil rights, women, and minorities not already identified in the FEIS for the Forest Plan will be expected to result from implementation of any

alternative. Alternative B-Modified will be governed by Forest Service contracts, which are awarded to qualified contractors and/or purchasers regardless of race, color, sex, religion, etc. Such contracts also contain nondiscrimination requirements (FEIS Chapter 3, page 3-189).

**Treaty Trust Responsibilities** - In this analysis, the primary focus of the federal government's Trust Responsibility is the protection of the treaty rights and interests that tribes reserve on land included in this project. The Nez Perce Tribe has treaty rights and interests in the South George project planning area.

For this project, a government to government scoping letter was sent to tribal staff members of the Nez Perce Tribe on March 2, 2009, informing them of the South George proposed project and requesting any comments or concerns regarding this proposed project. Pomeroy's District Ranger presented the District's Program of Work to Nez Perce tribal staff members on May 23, 2011, and November 7, 2011. At these meetings, projects are presented and an offer is made by the District Ranger to respond to any questions or present any additional information requested on a project. No specific comments or concerns for South George project were presented by tribal staff members after the government to government consultation scoping letter or Program of Work meetings. Tribal staff members have identified for similar past projects the rights they believed most at risk. Of major concern are potential effects on Treaty rights, fish habitat and populations, water quality, and protection of archaeological sites, traditional cultural properties, and first foods resources.

Timber harvest has the potential to negatively affect water quality and thus indirectly aquatic habitat. The effects of harvest and associated activities on water quality are discussed in the Hydrology section (FEIS, Chapter 3, pages 3-15 to 3-31). It was found that effects of the action alternatives would not adversely or measurably affect water quality. The action alternatives were designed to prevent damage to RHCAs. Riparian and channel components that protect water quality would be maintained. Other design criteria and BMPs will control disturbance that could lead to erosion and sedimentation.

The effects of harvest and associated activities on aquatic species and habitats are found in the Fisheries section. It was determined that action alternatives may effect – not likely to adversely affect threatened species and may impact some sensitive species (FEIS, Chapter 3, Table 3-15, page 3-45).

Based on the information summarized above, it is reasonable to assume that treaty rights would be protected during implementation of the Alternative B-Modified (FEIS, Chapter 3, pages 3-189 t 3-190).

**Floodplains and Wetlands** - Executive Orders 11988 and 11990 - Executive Order (EO) 11988 requires the Forest Service to avoid “to the extent possible the long and short term adverse impacts associated with the occupation or modification of floodplains...” Alternative B-Modified will avoid all floodplains and affects to floodplains, and are consistent with this EO (FEIS, Chapter 3, page 3-190).

Executive Order (EO) 11990 requires the Forest Service to “avoid to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands.” Alternative B-Modified will avoid all wetlands and affects to wetlands, and are consistent with this EO.

**Municipal Watersheds** - There is no de-facto or designated municipal watershed in South George project planning area (FEIS, Chapter 3, page 3-190).

**Energy Requirements** - No adverse effects on energy requirements will be expected to result from implementation of the selected alternative (FEIS, Chapter 3, page 3-190).

**Public Health and Safety** - Public health and safety will be improved with Alternative B- Modified removing danger trees along haul routes and trailheads within South George project planning area (FEIS, Chapter 3, page 3-190).

**Environmental Justice** - Executive Order 12898 requires that Federal agencies adopt strategies to address environmental justice concerns within the context of agency operations. With implementation Alternative B-Modified there will be no disproportionately high and adverse human health or environmental effects on minority or low-income populations. The actions will occur in a remote area and nearby communities will mainly be affected by economic impacts related to contractors implementing harvest, non-commercial thinning, planting, fuels treatment, and burning activities. Racial and cultural minority groups could be prevalent in the work forces that implement these activities. Contracts contain provision clauses which address worker safety (FEIS, Chapter 3, page 3-190).

## **NATIONAL FOREST MANAGEMENT ACT (NFMA) AND FOREST PLAN CONSISTENCY**

**National Forest Management Act** - As disclosed in the FEIS, Appendix C all silviculture activities are consistent with NFMA. The selected alternative (Alternative B-Modified) will harvest more wood products than Alternative D, and the economic value from those products, thereby, contributing to a portion of the Forest Plan's allowable sale quantity (FP, Chapter 4).

Timber harvest silvicultural activities in South George Vegetation and Fuels Management Project are consistent with the National Forest Management Act (NFMA), 16, U.S.C. Section 1604 (g) (3) (E) (i) through (iv) and F(i) and (iii). As required by NFMA Section 1604 (i), I find this project to be consistent with the Forest Plan (Chapter 2 of the FEIS discloses information on the activities proposed in each alternative along with design features, and Chapter 3 discloses information on the environmental effects of implementing these activities and the findings of consistency with the Forest Plan and applicable laws, regulations, and policies).

**Umatilla Land and Resource Management Plan (Forest Plan)** - This decision to implement timber harvest to improve species composition, structural diversity, stocking densities and reduce fuels, and other proposed activities such as landscape prescribed burning, non-commercial manual and mechanical fuel treatments, and danger tree removal is consistent with the intent of the Forest Plan's long term goals and objectives (Forest Plan (FP), pp. 4-1 to 4-3 and 4-15 to 4-46). This project was designed in conformance with Forest Plan standards and incorporates appropriate guidelines for soils, wildlife habitat, riparian and fisheries habitat, vegetation, water quality, fuels, air quality, pest management, threatened, endangered, and sensitive species, visual resources, wild and scenic rivers and management area guidelines (FP pp. 4-47 to 4-195).

The effects of implementing project activities in the selected alternative is consistent with Umatilla National Forest Land and Resource Management Plan Final Environmental Impact Statement, Record of Decision, the accompanying Land and Resource Management Plan, (USDA Forest Service 1990), dated June 11, 1990, as amended (FEIS, Chapter 3, pages 3-14; 3-31; 3-46; 3-70; 3-92; 3-7; 3-127; 3-141; 3-148; 3-151; 3-155; 3-159; 3-170; 3-175; and 3-188).

My decision on this project is based on a review of the project record that shows consideration of relevant scientific information, best available science, including responsible opposing views, and as appropriate, the acknowledgement of incomplete or unavailable information, scientific uncertainty, and risk. As

required by NFMA (see section above), I find this project to be consistent with Umatilla National Forest Land and Resource Management Plan (Forest Plan).

## **ENVIRONMENTALLY PREFERRED ALTERNATIVE**

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In this Record of Decision I have described the selected alternative, Alternative B-Modified, and given rationale for its selection. Based upon the description of alternatives and associated analysis detailed in the FEIS, I believe Alternative B-Modified is the environmentally preferred alternative. My rationale is as follows:

- It allows for treatment on more acres to meet and fulfill the purpose and need for the project with regard to stand densities, species composition, and forest stand structural class,
- it reduces ground and ladder fuels and allows fire to return to the area,
- it consistent with Forest Plan goals and objectives, Forest Service policy, and applicable laws, rules, and regulations,
- it allows for commercial harvest of forest products for community economic well-being while protecting biological, physical, and social resources in the area, and
- the decision I made reflects consideration of the viewpoints expressed by the public and professional land managers.

## **ADMINISTRATIVE REVIEW AND APPEAL PROCESS AND RIGHTS**

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This decision is subject to administrative review (appeal) pursuant to 36 CFR 215. The appeal must be filed (regular mail, fax, email, hand-delivery, or express delivery) with the Appeal Deciding Officer: Kevin Martin, Forest Supervisor, Umatilla National Forest.

Send appeals to:

USDA, Forest Service  
Umatilla National Forest,  
ATTN: Kevin Martin, Forest Supervisor  
72510 Coyote Road  
Pendleton, Oregon 97801

The notice of appeal may alternatively be faxed to:

USDA, Forest Service  
Umatilla National Forest,  
ATTN: Kevin Martin, Forest Supervisor  
(541) 278-3920

Or delivered by hand to:

Umatilla Forest Supervisor's Office in Pendleton, Oregon (address above)  
from 8 a.m. to 4:30 p.m., Monday through Friday.

By electronic mail at: [appeals-pacificnorthwest-umatilla@fs.fed.us](mailto:appeals-pacificnorthwest-umatilla@fs.fed.us)

It is the responsibility of persons providing comments by electronic means to ensure that their comments have been received. In cases where no identifiable name is attached to an electronic message, a verification of identity will be required. A scanned signature is one way to provide verification.

Appeals, including attachments, must be filed within 45 days from the publication date of the legal notice of decision in the East Oregonian, our newspaper of record. Appeals and or attachments received after the 45 day appeal period will not be considered. The publication date in the East Oregonian is the exclusive means for calculating the time to file an appeal (36 CFR 215.15 (a)). Those wishing to appeal this decision should not rely upon dates or timeframe information provided by any other source.

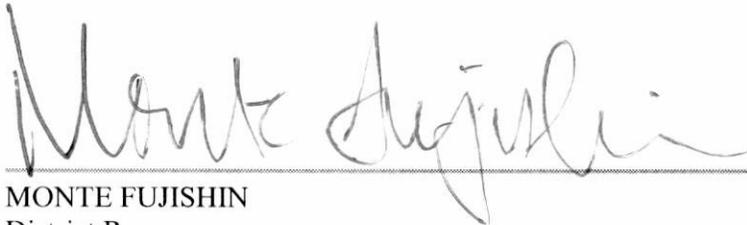
Individuals or organizations who provided comments or otherwise expressed interest in this project by the close of the comment period specified at 36 CFR 215.6 may appeal this decision. The notice of appeal must meet the appeal content requirements at 36 CFR 215.14.

## IMPLEMENTATION DATE

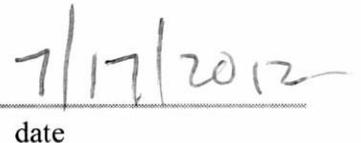
If no appeals are received within the 45-day appeal filing time period (see Appeal Process and Rights, (above), implementation of the decision may occur on, but not before, 5 business days from the close of the appeal filing period. If appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal disposition.

## CONTACT INFORMATION

For additional information concerning this decision or the Forest Service appeal process, contact Dan Castillo, Project Team Leader, Umatilla National Forest, Pomeroy Ranger District, 71 W. Main Street, Pomeroy, WA 99347, call (509) 843-1891, email [dcastillo@fs.fed.us](mailto:dcastillo@fs.fed.us).



MONTE FUJISHIN  
District Ranger  
Pomeroy Ranger District  
Umatilla National Forest



date

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