



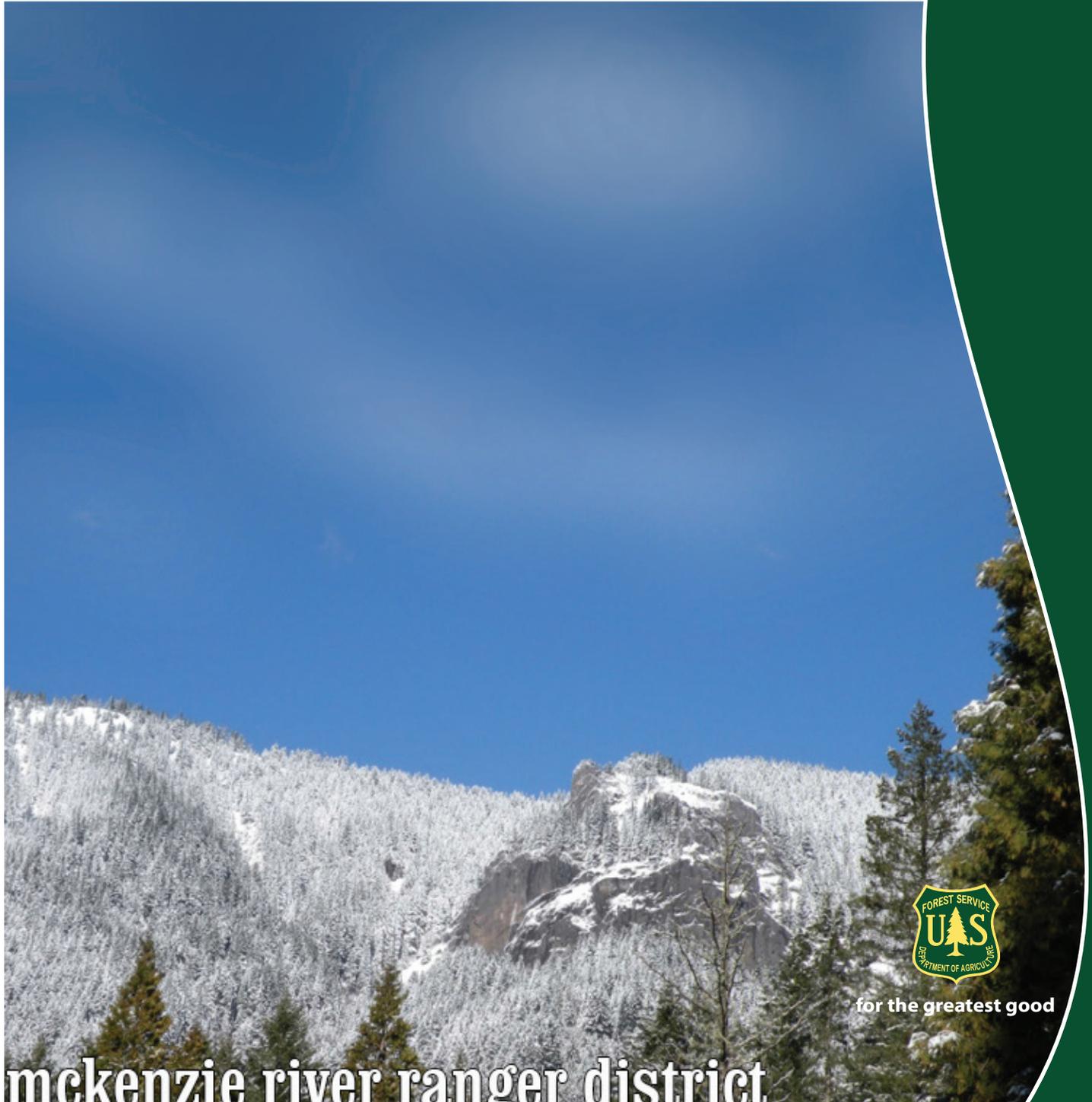
United States Department of Agriculture

Goose Project

Record of Decision

36 CFR 218 Objection Process *Draft*

Legal Location: T16S R5E: 1-4, 9-15; T16S R6E Sec: 7-11, 14-18, 20-23
Willamette Meridian; Lane County, Oregon



for the greatest good

mckenzie river ranger district
WILLAMETTE NATIONAL FOREST

August
2015



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36 CFR 218 Objection Process *Draft*

Goose Project
Willamette National Forest
Lane County, Oregon

August 2015

Lead Agency: USDA Forest Service

Responsible Official: TERRY BAKER
McKenzie River District Ranger
Willamette National Forest
57600 McKenzie Hwy
McKenzie Bridge, OR 97413
541-822-7200

For Information Contact: ELYSIA RETZLAFF
NEPA Planner
57600 McKenzie Highway
McKenzie Bridge, OR 97413
541-822-7214

Project Website: <http://www.fs.usda.gov/project/?project=45853>

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Introduction

This *draft*¹ Record of Decision (ROD) documents my selection of an alternative from the *Goose Project Final Environmental Impact Statement (FEIS)*. The selection includes requirements for harvesting timber, harvest treatments, post-harvest fuels treatments, hazardous fuels treatments, harvest systems, temporary road construction, and road maintenance. This ROD contains a brief summary of the environmental analysis completed for this project, as well as my decision regarding which alternative to implement, and the rationale for my decision. It also documents the findings required by other laws and the rights of administrative review or objection of this decision. The FEIS completed for the Goose Project is incorporated by reference in this decision document.

Project Location and Description

The project area encompasses 17,932 acres along Highways 126 and 242, near the community of McKenzie Bridge, Oregon. The project area is located in Florence Creek-McKenzie River; Elk Creek-McKenzie River; and Lost Creek 6th field watersheds. The legal description is: Township 16 South, Range 5 East, Sections 1-4, 9-15; Township 16 South, Range 6 East, Sections 7-11, 14-18, and 20-23.

14,713 acres in the project area are managed by the Willamette National Forest with the remaining 3,219 acres belonging to private land holders. The project area is composed mostly of a Douglas-fir and western hemlock overstory, with an understory shrub component of vine maple, salal, dwarf Oregon grape, sword fern and Pacific rhododendron. Prior to the 1940's, fire was a dominant disturbance in the project area. Records indicate four large, stand replacing wildfires have occurred in the project area over the past 100 years and approximately 69 smaller, low to moderate severity fires since the 1970s. More recently, timber harvest, including thinning, partial cut, and regeneration harvest, has been the dominant disturbance in the project area over the last 100 years.

The project area is popular for several recreational activities. Driving for pleasure (sightseeing) is a popular activity, primarily during the summer months when roads are open and free of snow. Two National Scenic Byways pass through the project area; the West Cascades National Scenic Byway and the McKenzie Pass-Santiam Pass National Scenic Byway. The McKenzie River flows through the project area between Belknap Springs and McKenzie Bridge Campground. The McKenzie River is regionally and nationally known for its outstanding recreational opportunities and scenery. Portions of the McKenzie River National Recreation Trail (4.5 miles) also pass through the project area. This trail receives very high use and is nationally renowned for hiking and mountain biking. Three developed campgrounds, McKenzie Bridge, Paradise, and Limberlost, as well as 15 dispersed camp sites are located in the project area.

Purpose and Need

The purpose of the Goose project is to, (1) Provide a sustainable supply of timber products, (2) Reduce hazardous fuels in the McKenzie Bridge Wildland-Urban Interface (WUI), and (3) Actively manage stands to improve stand conditions, diversity, density, and structure.

Provide a Sustainable Supply of Timber Products

The proposed project is needed to ensure the Willamette National Forest continues to supply a reliable supply of timber products as directed by the laws and guidance discussed in Section 1.3 of the FEIS and

¹ This Record of Decision is a "draft" (a decision has not been made and this ROD has not been signed) per predecisional administrative review regulations at 36 CFR 218, effective March 27, 2013.

in doing so contributes to the stability of local, regional, and national economies and achieves the annual Probable Sale Quantity (PSQ) target for the Forest.

Reduce Hazardous Fuels in the McKenzie Bridge Wildland-Urban Interface (WUI)

Fire suppression over the past century has resulted in increased fuel loading throughout forest ecosystems. This increased fuel loading consists of surface fuels, ladder fuels (small trees and brush that can carry fire into larger tree crowns), and dense overstory canopies. The proposed project is needed to treat hazardous fuels in the McKenzie Bridge WUI to reduce potential wildfire impacts and risks to the many private dwellings and residents in the project area.

Actively Manage Stands to Improve Stand Conditions, Diversity, Density and Structure

The proposed project is needed to improve stand conditions, diversity, density, and structure in the project area, providing benefits to vegetation, wildlife, and overall health of the forest. This would be achieved by increasing stand health and vigor, increasing the amount of early seral habitat, and increasing the potential for Riparian Reserves to function as late successional habitat.

Decision

Based on my review of public and agency comments; the effects analysis in the FEIS; supporting reports and documentation; and applicable laws, regulations, and policies; it is my decision to implement Alternative 2 with modifications. Alternative 2 with modifications is hereafter referred to as Alternative 2A.

My decision modifies Alternative 2 by removing Unit 420 from the project and changing the prescription in Unit 10 by converting 28 acres of gaps to thinning. This modification has been made in response to public comments and further field investigation. Specifically, this modification will:

- Reduce the total treated acreage by 27 acres
- Reduce acreage of gaps by 28 acres
- Reduce acreage of dominant tree release by 1 acre
- Reduce acreage of skips in Riparian Reserves by 9 acres
- Reduce acreage of post-harvest underburn by 18 acres
- Reduce acreage of ground based harvest by 18 acres
- Increase acreage of thinning by 11 acres
- Eliminate .2 miles of temporary road construction

Alternative 2A will allow treatments on approximately 2,425 acres in the project area. Harvest treatments will include thinning, gap creation, dominant tree release, regeneration harvest, and skips. Harvest treatments will occur in stands ranging in age from approximately 27-127 years old and yield approximately 35 million board feet of timber. Post-harvest fuels treatments include pile and burn and post-harvest underburn. WUI fuels treatments will include natural fuels underburn and hazardous fuels treatments in stands ranging in age from 39-394 years old. Approximately 6.7 miles of temporary road construction will occur and approximately 43 miles of existing road will be maintained.

Table ROD-1 describes the features of Alternative 2A in detail. Figure ROD-1 and ROD-2 show the project area and spatial location of the Alternative 2A project units.

ROD-1. Summary of Treatments and Connected Actions for Alternative 2A

Activity	Unit of Measure	Alternative 2A	Purpose – Need Addressed ⁴
Timber Harvest Treatments			
Thinning outside Riparian Reserves	Acres	1,091	1, 2, 3
Thinning in Riparian Reserves	Acres	138	3
Regeneration Harvest	Acres	43	1,3
Gaps	Acres	253	1, 2, 3
Dominant Tree Release	Acres	49	1, 3
Skips outside Riparian Reserves	Acres	173	3
Skips in Riparian Reserves	Acres	282	3
Total	Acres	2,029	-
Estimated Volume	MMBF	~35	1
WUI Fuels Treatments – No Timber Harvest			
Natural Fuels Underburn outside Riparian Reserves	Acres	33	2, 3
Natural Fuels Underburn in Riparian Reserves	Acres	0	3
Hazardous Fuels Treatment outside Riparian Reserves	Acres	189	2, 3
Hazardous Fuels Treatment in Riparian Reserves	Acres	136	2, 3
Skips (associated with WUI)	Acres	38	2, 3
Total WUI Fuels Treatment	Acres	396	
Post-Harvest Fuels Treatments¹ in Timber Harvest Units			
Pile and Burn (mechanical and/or hand treatments) ²	Acres	624	2
Post-Harvest Underburn ³	Acres	459	2, 3
Connected Actions			
Harvest System			
Helicopter	Acres	215	-
Skyline	Acres	582	-
Ground	Acres	777	-
Transportation			
Temporary Roads	Miles	6.7	-

Activity	Unit of Measure	Alternative 2A	Purpose – Need Addressed ⁴
Road Maintenance/Haul Route	Miles	43	-
Post-Harvest Planting			
Planting in Regeneration Harvest	Acres	~43	3
Planting in Gaps	Acres	~77	3
Natural Regeneration in Gaps	Acres	~204	3
Other			

¹: Post-harvest fuels treatments methods may change depending on feasibility and funding. Post-harvest fuels treatments would occur in timber harvest units; therefore the acreage of post-harvest fuel treatments are not included in the total acres of treated units.

²: Mechanical treatment may include: grapple piling in slash concentrations, yarding tops attached, mastication, or any other mechanical device).

³: These acres are possible underburn acres due to dbh and location, not all acreage may be underburned. Acreage not underburned may have other post-harvest fuels treatments assigned before implementation.

⁴: 1- Provide a sustainable supply of timber products; 2- Reduce hazardous fuel in the McKenzie Bridge Wildland-Urban Interface (WUI); and 3- Actively manage stands to improve stand conditions, diversity, density, and/or structure.

Goose Project Area (Alternative 2A)

West Half

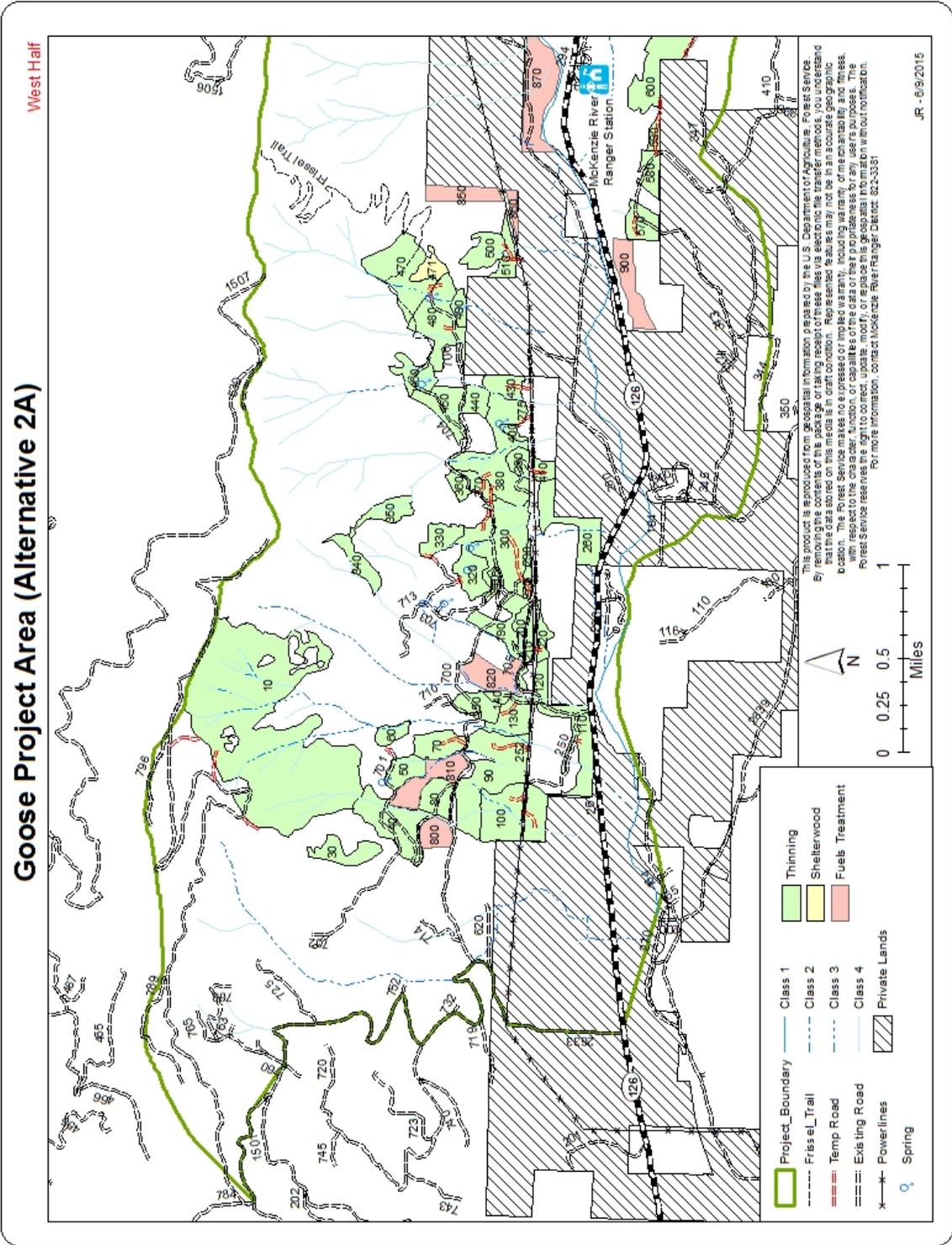


Figure ROD-1. Map of Alternative 2A (West Half)

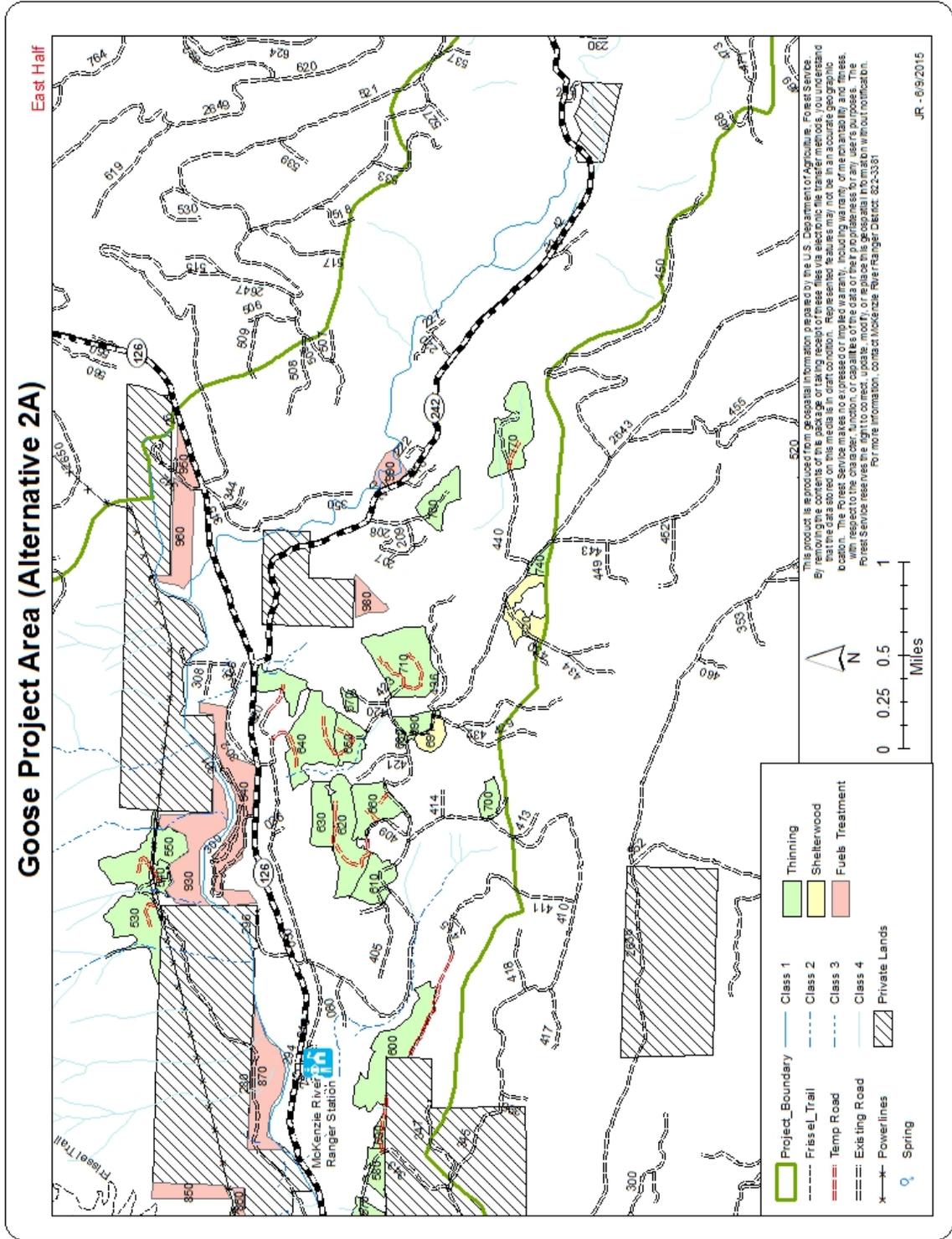


Figure ROD-2. Map of Alternative 2A (East Half)

Project Design Features and Monitoring Specific to Alternative 2A

While not repeated here, I am fully incorporating all project Design Features, Mitigation and Enhancement, and Monitoring included in the FEIS in Sections 2.5, 2.6 and 2.7 as part of Alternative 2A.

Design Features, Mitigation and Enhancement, and Monitoring are included to minimize the environmental effects of the project activities and to ensure project activities are implemented to comply with standards and guidelines, goals, objectives, conservation strategies, and Best Management Practices. I am satisfied that all practical measures to protect the environment are encompassed in this list and the measures have been proven effective in minimizing adverse impacts.

Briefly, Design Features and Mitigation and Enhancement have been included that will:

- Reduce compaction and undesirable soil damage
- Reduce contamination and sedimentation to aquatic areas
- Reduce the introduction and spread of invasive plants
- Protect road infrastructure
- Protect heritage resources
- Reduce impacts to the recreating public
- Minimize effects to species of concern
- Protect any discovered threatened, endangered or sensitive (TES) species
- Create snags to benefit wildlife

Monitoring and evaluation is also an important component of this decision. Monitoring will be focused on the proper implementation of the Design Features and Mitigation and consistency with the Forest Plan standards and guidelines throughout all phases of the project. Monitoring may also be used to gather and evaluate information to improve future projects.

Decision Rationale

Competing demands placed upon the Forest Service dictate that I make decisions for the responsible management of ecosystems and resources that fulfill the mission of the Forest Service and meet the requirements of laws and regulation. Every effort has been made to develop and choose an alternative that best responds to the components of the purpose and need, desired conditions, objectives, public and agency concerns, and maintains key resource values. I understand that my decision may not be acceptable to all members of the public, even with the modifications that I have made. However, I believe I have chosen the best course of action to meet the needs identified for land management in the project area. Implementing Alternative 2A will make important progress in moving the area toward desired conditions for vegetation, fuels, and habitat, while contributing to local and regional economies.

My decision meets the requirements of the National Environmental Policy Act (NEPA) and is based on the best science and information available. My decision involved balancing several considerations, including which alternative or combination of treatments best meets the purpose and need and project objectives, while at the same time protects watershed health, ensures soil productivity, provides for human health and safety, maintains recreational opportunities, maintains effective wildlife habitat, and protects cultural resources.

I reached my decision after careful consideration of public and agency comments, issues identified during the planning process, supporting reports and documentation in the project record, and the environmental

effects of the alternatives described in the FEIS. My decision was based upon several conclusions as a result of my consideration of the effects of the project on the environment. Notable conclusions include:

- Alternative 2A would treat the most acres without significant differences in effects to the environment when compared with Alternative 3
- Alternative 2A would contribute the largest supply of reliable timber products (~35MMBF), and in doing so, better contribute to the stability of local, regional and national economies
- Alternative 2A would treat the most acres when compared with Alternative 3, thereby improving stand conditions, diversity, density, and structure over a larger area
- Alternative 2A would create the most acreage of early seral habitat, increasing the current amount from 0.11 percent to 3.2 percent in the project area
- Alternative 2A would reduce the greatest amount of hazardous fuels in the McKenzie Bridge Wildland-Urban Interface (WUI), providing more defensible space to provide for public and firefighter safety
- Alternative 2A would repair and maintain the greatest number of roads (43 miles), providing a road system that meets the public and management access needs, while reducing the risk of sediment reaching streams and impacts to aquatic species and habitat

Response to Purpose and Need

Provide a Sustainable Supply of Timber Products

The Goose project is needed to ensure the Willamette National Forest continues to supply a reliable supply of timber products as directed by laws and guidance and in doing so contributes to the stability of local, regional, and national economies and achieves the annual Probable Sale Quantity (PSQ) target for the Forest.

The Willamette National Forest Land and Resource Management Plan as amended by the Northwest Forest Plan, includes goals to produce an optimum and sustainable yield of timber that helps maintain the stability of local and regional economies, and contribute valuable resources to the national economy on a predictable and long-term basis. The current PSQ annual target for the Willamette National Forest is 111 million board feet (MMBF) as amended by the Approval of PSQ Estimates for Northwest Forest Plan Forests (1998). Through implementation of Alternative 2A, the McKenzie River Ranger District would contribute approximately 35 MMBF to the Willamette National Forest PSQ target over a two year period (approximately 17.5 MMBF/year).

Reduce Hazardous Fuels in the McKenzie Bridge Wildland-Urban Interface (WUI)

The Goose project is needed to treat hazardous fuels in the McKenzie Bridge WUI to reduce potential wildfire impacts and risks to the many private dwellings and residents in the project area. Fire suppression over the past century has resulted in increased fuel loading throughout forest ecosystems. This increased fuel loading consists of surface fuels, ladder fuels (small trees and brush that can carry fire into larger tree crowns), and dense overstory canopies. Much of the Forest Service land surrounding communities and private residences in the project area currently exhibits a fuel profile conducive to high severity wildfires through continuous tree canopies, dense understory, and/or areas of high surface fuel loadings.

Alternative 2A would reduce horizontal and vertical continuity of fuels on approximately 396 acres in and around the McKenzie Bridge WUI, decreasing potential impacts and risks to people, structures, and resources in the event of a wildfire.

Actively Manage Stands to Improve Stand Conditions, Diversity, Density and Structure

The proposed project is needed to improve stand conditions, diversity, density, and structure in the project area, providing benefits to vegetation, wildlife, and overall health of the forest.

Increase Stand Health and Vigor

Seventy-four percent of previously managed stands and fire regenerated stands proposed for harvest in the project area are classified as overstocked. Overstocked stands occur when trees are closely or densely spaced, resulting in a competition for resources. Closely spaced trees competing for resources generally result in decreased individual tree growth. Overstocked stands can also cause increased tree/stand stress, resulting in increased susceptibility to insect and disease outbreaks. Additionally, overstocked stands can increase the potential for high severity wildfires.

The Stand Density Index (SDI), which is a qualitative measure of tree competition within a stand, ranges from 214 to 554 and averages 366 for all stands being considered for treatment in the Goose project area. In Douglas-fir, the maximum SDI (SDI_{max}) is 595 (Reineke 1933). As a stand reaches an SDI of about 149, or approximately 25 percent of SDI_{max}, trees within the stand start to compete with each other. As SDI increases to around 357, or 60 percent SDI_{max}, trees reach a point at which they start dying due to competition, or self-thinning (Long 1985).

Seventy-four percent of previously managed stands and fire regenerated stands proposed for harvest in the project area are overstocked with an average SDI of 366 or 60 percent of SDI_{max}. Treatments approved with Alternative 2A would restore approximately 2,029 acres to healthy, vigorous stands with an average SDI of 200. Alternative 2A would help improve stand conditions, diversity, density and structure with thinning, gaps, and dominant tree release. Thinning the overstocked stands would make more growing space and resources available to the remaining trees, resulting in decreased tree stress and development towards larger diameter stands. Stand vigor would also be increased as released trees develop into larger trees sooner, accelerating the development of some late successional characteristics. Tree species, age, and structural diversity would be maintained or enhanced.

Increase the Amount of Early Seral Habitat

Age class diversity in forest stands is important as some species of animals and plants depend on younger stages of forests for their feeding, nesting, and breeding requirements, whereas other species thrive in older forests. Early seral habitat (defined as less than 20 years old) is of key importance to an estimated 156 species of wildlife in the central Oregon Cascades. A current analysis of seral stages in the Goose project area shows early seral habitat, of varying quality, on less than one percent of the landscape. Currently, early seral habitat within the Goose project area is only partially effective at providing quality diverse early seral habitat due to the lack of vertical and horizontal stand structure.

Alternative 2A would enhance, create, and maintain early seral habitat to support wildlife species that have been documented to depend on early seral habitat, such as elk, black-tailed deer, rufous hummingbirds, olive-sided flycatchers, and a large number of butterfly and moth species. Treatments implemented with Alternative 2A would increase early seral habitat to approximately three percent in the project area.

Increase the Potential for Riparian Reserves to Function as Late Successional Habitat

Portions of Riparian Reserves within project units consist of dense, overstocked, conifer-dominant stands with very little structural and species diversity and understory development. This lack of complexity and diversity is outside the natural range of variability and may be limiting nutrient cycling, deciduous organic matter input to waterbodies, and habitat for riparian-dependent wildlife.

Alternative 2A would treat approximately 138 acres of stands in Riparian Reserves. In overstocked, conifer-dominant portions lacking structural and species diversity, treatments under Alternative 2A would move these Riparian Reserves towards desired vegetation characteristics needed to more quickly attain Aquatic Conservation Strategy objectives. This would accelerate the ability of these Riparian Reserves to provide adequate stream shade, root strength and bank stability, sediment filtration and nutrient cycling, large wood supply to waterbodies and floodplains, organic matter input, and habitat for riparian-dependent wildlife. Alternative 2A would maintain conditions in currently functioning portions of Riparian Reserves.

Other Alternatives Considered

The Goose project considered three alternatives, including a no-action alternative. A comparison of the alternatives is included in Chapter 2 of the FEIS; the expected effects of these alternatives are described in detail in Chapter 3.

Alternative 1 – No Action

Alternative 1 – No-Action assessed the current management situation of the affected environment as well as the future conditions should an action not be implemented. The No-Action alternative should not be confused with a baseline. Whereas a baseline is essentially a description of the affected environment at a fixed point in time, the No-Action alternative considered what effects would occur to forest ecosystems and resources in the project area if no action is taken.

Under the No-Action alternative, no timber harvest, fuels treatments, or associated activities (i.e. road maintenance) would occur in the Goose project area at this time. The purpose and need of the proposed action would not be met under the No-Action Alternative; therefore, this alternative was not selected.

Alternative 2 – Proposed Action

Alternative 2 is the proposed action and was developed to fully meet the purpose and need for this project. Alternative 2 proposed to treat approximately 2,452 acres in the project area and would yield approximately 35 million board feet of timber. Approximately 6.9 miles of temporary road construction would occur and approximately 43 miles of existing road would be maintained under Alternative 2.

Alternative 2, as originally presented and analyzed in the FEIS, was not selected because it would not be responsive to comments and concerns received from the public during the 45-day comment period.

Alternative 3 – No Harvest or Underburn in Fire Regenerated Stands

During the EIS scoping process, three key issues were identified from comments and questions:

Key Issue #1: Harvest treatments and underburning should not occur in fire-regenerated stands (i.e. naturally regenerated stands)

Key Issue #2: Harvest treatments should not occur in stands over 80 years of age

Key Issue #3: No regeneration harvest (Shelterwood with Reserves) should occur

In response to these issues, Alternative 3 was developed, which eliminated harvest and underburning in fire-regenerated stands; harvest in stands over 80 years of age; and regeneration harvest. Alternative 3 proposed to treat approximately 1,069 acres in the project area and would yield approximately 9 million board feet of timber. Approximately 2.2 miles of temporary road construction would occur and approximately 26 miles of existing road would be maintained under Alternative 3.

Because no regeneration harvest, harvest or underburning in fire-regenerated stands, or harvest in stands over 80 years of age would occur under Alternative 3, proposed acres for treatment decrease by 1,312 acres from Alternative 2. While this alternative would still meet the purpose and need, it would do so to a lesser degree; therefore, Alternative 3 was not selected.

The Environmentally Preferable Alternative

The Council on Environmental Quality (CEQ) regulations for implementing the National Environmental Policy Act (NEPA) require that the record of decision specify “the alternative or alternatives which were considered to be environmentally preferable” (40 CFR § 1505.2(b)). “Environmentally preferable” is interpreted to mean the alternative(s) that would cause the least damage to the biological and physical components of the environment, and which best protects, preserves, and enhances, historic, cultural, and natural resources (CEQ, *40 Most Asked Questions Concerning CEQs National Environmental Policy Act Regulations*, 46 Federal Register 18026). The environmentally preferable alternative is not necessarily the alternative that will be implemented and it does not need to meet the purpose and need for the project.

Factors considered while identifying the environmentally preferable alternative included: (1) fulfilling the responsibility of this generation as trustee of the environment for future generations; (2) providing for a productive and aesthetically pleasing environment; (3) attaining the widest range of beneficial uses of the environment without degradation; (4) preserving important natural components of the environment, including biodiversity; (5) balancing population needs and resources use; and (6) enhancing the quality of renewable resources (42 CFR § 101(b)). Additionally, economic and technical considerations and statutory missions were considered (40 CFR § 1505.2(b)).

Based upon the factors considered above, examination of the FEIS, discussions with the interdisciplinary team, and consideration of agency and public comments, I have concluded that Alternative 2A is the environmentally preferable alternative. Alternative 2A will improve stand conditions, diversity, density, and structure in the project area, providing benefits to vegetation, wildlife, and overall health of the forest. Alternative 2A will improve and create wildlife habitat; restore and improve species diversity and complexity in Riparian Reserves; reduce compaction and undesirable soil damage; reduce sedimentation and contamination to aquatic areas; contribute to economic stability; and protect and improve road infrastructure. Additionally, Alternative 2A will reduce hazardous fuels in the McKenzie Bridge Wildland-Urban Interface (WUI), decreasing potential impacts and risks to people, structures, and resources in the event of a wildfire.

Specific Issues of Concern

Several specific issues of concern were brought forth during the scoping comment period and the 45-day comment period for the Goose Draft Environmental Impact Statement (DEIS). These issues were given careful consideration and in many cases incorporated into project design, alternatives, analysis, and design features. These issues are discussed in more detail in Chapter 2 and 3 of the FEIS, as well as the Response to Comments found in Appendix G. However, I wanted to summarize a few of these issues and my conclusions.

Harvest of Stands Over 80 Years of Age

Concerns were raised about harvest in stands over 80 years of age. Stands selected for treatment were filtered through a series of management restrictions and legal side boards. Those stands which made it through the filter were then evaluated as to how they would or would not help achieve the purpose and need of the project. Stand age is a metric that is easy to understand. However, it does not provide a complete picture about stand development, composition, or characteristics. Stand Density Index (SDI) is

a metric used to describe a stand regardless of age; SDI is about density and competition. In an effort to better achieve the purpose and need of the project, I looked at SDI rather than stand age to identify stands for treatment.

Harvest in Fire Regenerated Stands (Naturally Regenerated)

Concerns were raised by the public regarding harvest in fire regenerated stands during public scoping. Approximately 1,205 acres of fire regenerated stands are proposed for harvest in Alternative 2A. In fire regenerated stands, the average age is 81 years old with a range of 50-127 years old. These stands are within the “stem exclusion” stage. Small amounts of understory development are apparent in openings created as the stands have started competition mortality.

As these Douglas-fir dominated stands reach an SDI of about 149, or approximately 25 percent of SDI_{max}, trees within the stand start to compete with each other. As SDI increases to around 357, or 60 percent of SDI_{max}, trees reach a point at which they start dying due to competition or self-thinning. The fire regenerated stands proposed for harvest in the Goose project have an average SDI of 417, which is 70 percent of maximum SDI. Without treatment, these stands will have decreased growth, increased rates of mortality, higher risk for insect and disease attacks, and higher risk for stand replacing fires. Therefore, I have determined that implementation of Alternative 2A, which would move these stands towards an average SDI of 200, would have the greatest benefit to trees within these stands, returning them to a healthy, vigorous condition.

Early Seral Habitat

Concerns were raised regarding the creation of early seral habitat during the DEIS 45-day comment period. Specifically, commenters were concerned that early seral habitat creation was not needed and spatial scales used for analysis were not accurate.

Age class diversity in forest stands is important as some species of animals and plants depend on younger stages of forests for their feeding, nesting, and breeding requirements, whereas other species thrive in middle age or old forests. Early seral habitat (defined as less than 20 years old) is of key importance to an estimated 156 species of wildlife in the central Oregon Cascades.

Analysis of early seral conditions was performed at the watershed level and at the project level. The Goose project area occurs in three 6th field watersheds: Lost Creek, Florence Creek-McKenzie River, and Elk Creek-McKenzie River. Within these watersheds, approximately 30,164 acres of forest land are managed by the Forest Service. Within this 30,164 acres only 43 acres (0.14%) is early seral habitat (less than 20 years old). Of the 43 acres of early seral habitat in these watersheds, 15 acres occur in the Goose project area, eight of which are located in the Lost Creek watershed; six in the Florence Creek-McKenzie River watershed; and one in the Elk Creek-McKenzie River watershed. Implementation of Alternative 2A would create approximately 420 acres of diverse quality and structurally rich early seral habitat in the project area with gaps, regeneration harvest, and dominant tree release. At the watershed level, this would increase early seral habitat from 0.14 percent to 1.5 percent. At the project level, this would increase early seral habitat from 0.11 percent to 3.2 percent.

Old Growth

Concerns were raised regarding harvest of old growth stands during public scoping and the DEIS 45-day comment period. Although some mature trees are proposed for logging, no harvest in old growth stands was proposed in this project. PNW-447 (USDA 1986) provides criteria for defining old growth which has been used in this project. Please refer to section 3.1.3 in the FEIS for a detailed description of stand age classification.

Soil Compaction

Concerns were raised regarding soil compaction from project activities during the DEIS 45-day comment period. Specifically, commenters were concerned that units in the project area would exceed Forest Plan standards and guidelines for compaction levels. Currently, two units (100 and 410) exceed Willamette National Forest standard FW-081 of 20 percent of an activity impacted by compaction. As mitigation in Units 100 and 410, all landings, temporary haul or primary skid roads utilized by the purchaser/logger would be subsoiled to a depth of 18 to 24 inches at the completion of logging activities. Additional enhancement subsoiling is required for heavily compacted areas not utilized by the Purchaser in Unit 100 and 410. Subsoiling of landings and temporary roads or primary skid roads is required in all ground based units to ensure that cumulative levels remain below the 20 percent standard outlined in the Forest Plan. Some post-sale enhancement subsoiling is recommended for areas not utilized by the Purchaser in units that are approaching the 20 percent compaction standard.

Mitigation as described above would result in reduced compaction levels; as such, the end result of the Goose project is that no compaction standards will be violated. Please refer to Chapter 2, Table 13 (Design Features) and Chapter 3.3.4 in the FEIS for additional information.

Areas That May Be Suitable for Inclusion in the National Wilderness Preservation System (NWPS)

Concerns were raised during the DEIS 45-day comment period regarding the inventory of areas that may be suitable for inclusion in the NWPS. Previous USFS direction in Region 6 directed forests to perform an inventory of areas that may be suitable for inclusion in the NWPS during project level analysis. On January 30, 2015, the USFS released new directives that clearly state inventory, evaluation, and recommendation of areas that may be suitable for inclusion in the NWPS should occur during forest plan development or revisions (FSH 1090.12).

I originally made the determination to keep the inventory of these potentially suitable areas in the Goose DEIS because it was included in the Goose Environmental Assessment and subsequent Finding of No Significant Impact and Decision Notice and was a point of concern that constituted “significance” based on Judge Aiken’s ruling in *Cascadia Wildlands and Oregon Wild vs USFS*. However, after evaluating multiple public comments addressing this issue and further review of the new directives, I have determined that inventory of areas that may be suitable for inclusion in the NWPS will be done at the planning level as directed by FSH 1909.12. As such, inventory of areas that may be suitable for inclusion in the NWPS has been dropped from the Goose project.

Public Involvement

Public involvement efforts during the development of the Goose project included public meetings, open-houses, scoping letters, field trips, meetings with interested parties and landowners, and publication of the project in the Willamette National Forest Schedule of Proposed Actions and Willamette National Forest website. Below is a timeline illustrating public involvement efforts for the Goose project:

- April 30, 2014: Notice of Intent (NOI) to prepare an EIS published in the Federal Register
- April 24, 2014; May 1, 2014: District open-house public meetings at McKenzie Bridge, Oregon
- May 2, 2014: Public meeting to discuss Goose project held in McKenzie Bridge, Oregon
- May 9, 2014: Public meeting to discuss Goose project held in Leaburg, Oregon

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- May 27, 2014: Scoping letter and background information mailed to members of the public, organizations, and state/federal agencies that have expressed interest in receiving information on District projects
 - July 1, 2014: Project published in the Willamette National Forest Schedule of Proposed Actions
 - March 6, 2015: Notice of Availability (NOA) and initiation of 45-day comment period for Draft Environmental Impact Statement (DEIS) published in the Federal Register
 - March 9, 2015: Notice of Availability (NOA) and initiation of 45-day comment period for DEIS published in the *Register Guard*
 - March 24, 2015: Public meeting to discuss Goose project held in Leaburg, Oregon
 - March 25, 2015: Public meeting to discuss Goose project held in McKenzie Bridge, Oregon
 - April 14, 2015: Public field trip to view and discuss Goose project.

Additionally, the McKenzie River District Ranger and other staff met with the McKenzie Clearwater Coalition, the Blue McKenzie Lions Club, Congressmen Peter DeFazio, staff from Senators Jeff Merkley and Ron Wyden's office, and multiple landowners with property adjacent to the project area. I personally responded to over 150 emails and 50 phone calls regarding the project.

Members of the public, organizations, and state and federal agencies were invited to provide comments and concerns about the Goose project during the public scoping comment period from April 30th through June 16th, 2014. Scoping comments received varied from those that wanted more clarification on proposed activities to specific suggestions for project implementation. Scoping comments were used to help develop planning issues, alternatives, and effects analysis for the DEIS.

Members of the public, organization, and state and federal agencies were invited to provide comment on the DEIS during the 45-day comment period from March 6th through April 20th, 2015. Approximately 700 letters were received from members of the public, federal officials, public interest organizations, and private businesses. Comments received varied from general statements of support or opposition to requests for additional analysis. Comments on the DEIS and the corresponding responses are located in Appendix G. A complete record of all letters, including names and addresses of individuals, agencies, and organizations that submitted a letter during the 45-day comment period, is available online in the Goose EIS Public Reading Room at <https://cara.ecosystem-management.org/Public//ReadingRoom?Project=45853>

All correspondence and comments are available in the project record at the McKenzie River Ranger District office.

Tribal Consultation

Tribal consultation for the Goose project began in 2009 during the development of the environmental assessment. The McKenzie River Ranger District consulted with the Klamath Tribes, the Confederated Tribes of Grand Ronde, the Confederated Tribes of Siletz Indians and the Confederated Tribes of Warm Springs. On November 2, 2009 the Tribes received a consultation package that included information about the proposed project location, proposed actions, and the purpose and need for the project. Additionally the consultation invited the Tribes to provide any comments or concerns regarding the proposed project. One comment was received from the Confederated Tribes of the Grand Ronde.

During development of the Goose project, a consultation package and invitation to comment was sent to the Tribes listed above on May 27, 2014. No comments were received. The Tribes were invited to provide comment on the DEIS during the 45-day comment period from March 6th through April 20th,

2015 and to attend public meetings in Leaburg and McKenzie Bridge, Oregon in March of 2015. No comments were received. The Goose project has been presented at annual individual Willamette National Forest and Tribal meetings since 2010.

Consultation with other Agencies

United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS)

Upper Willamette River Chinook Salmon and Bull Trout

Endangered Species Act (ESA) informal consultation with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for Upper Willamette River spring Chinook salmon and Columbia River bull trout was completed during the development of the EA (2009-2010). In March 2010, a final Biological Assessment was submitted to USFWS and NMFS. Letters of concurrence were received from USFWS (April 14, 2010) and NMFS (March 30, 2010) concurring with the determinations in the Biological Assessment. No conservation measures were issued. During development of this FEIS, it was determined that no additional consultation was required as only minor changes were made to the proposed action, mostly being more conservative (i.e. larger no-treatment buffers).

Northern Spotted Owl

Endangered Species Act (ESA) formal consultation with the USFWS for the Northern Spotted Owl was completed in 2009 and evaluated by the USFWS in the 2009 Biological Opinion (FWS reference 13420-2010-F-0001) signed November 25, 2009. Subsequently, Critical Habitat for the northern spotted owl was modified with the 2012 Critical Habitat Rule. This resulted in reinitiation of consultation and an additional Biological Opinion (FWS Reference Number 01EOFW00-2013-F-0115) that addressed the effects to 2012 Critical Habitat for activities proposed by the Goose project. USFWS issued the additional Biological Opinion on April 22, 2013.

U.S. Environmental Protection Agency (EPA)

During project scoping, the EPA submitted a list of recommendations for analysis and project design. This letter was reviewed and recommendations incorporated as appropriate. Per Forest Service regulations, this FEIS will be filed with the EPA's Office of Federal Activities in Washington, DC, who will publish a notice of availability in the Federal Register.

Oregon State Historic Preservation Office

The 1995 Programmatic Agreement (PA) among the USDA Forest Service PNW, the Advisory Council on Historic Preservation, and the Oregon State Historic Preservation Officer (SHPO) Regarding Cultural Resource Management in the State of Oregon by the USDA Forest Service, (amended in 2004), provides a process by which the Forest Heritage Specialist may certify that the Forest has complied with Section 106 of NHPA for the project. In accordance with this PA, an appropriate inventory was conducted in July 2009. All known cultural sites in the Area of Potential Effect (project area) were protected by avoidance, resulting in a determination of "No Historic Properties Affected" on November 19, 2014. Documentation was provided by SHPO and copies have been retained in the Forest and District Heritage files.

Oregon State Parks and Recreation Department

Segments of the McKenzie River are designated Oregon State Scenic Waterway, which is administered by the Oregon State Parks and Recreation Department. The State Scenic Waterway segments have a dual classification, with the west side of the McKenzie River classified as Scenic River Area and the east side

of the river classified as Recreation River Area. Scenic Waterway Act and Commission rules require the evaluation of proposed development within ¼ mile from each side of the river. Approval for timber harvest or salvage within this scenic waterway was requested May 29, 2012 and granted by Oregon State Parks and Recreation on September 28, 2012.

Findings Required by Other Laws and Regulation

The Selected Alternative complies with the following laws and regulations:

The National Environmental Policy Act (NEPA), 1969 – NEPA establishes the format and content requirements of environmental analysis and documentation. Preparation of the Goose FEIS was prepared in full compliance with these requirements.

The National Forest Management Act (NFMA), 1976 –All proposed timber harvest units are planned to occur on suitable land. If regeneration harvest is implemented the sites would be capable of restocking within 5 years of harvest by either natural or artificial means. All units were considered for potential uneven-aged management. Proposed commercial thinning would increase the rate of growth of remaining trees. Some locations would favor species or age classes most valuable to wildlife. The resultant reduced stress on residual trees would make treated stands less susceptible to pest-caused damage. Design features have been identified to protect site productivity, soils, and water quality.

The burning of activity fuels would reduce long-lasting hazards from wildfire and reduce the risk of pest outbreaks over the project area as a whole. Air quality would be maintained at a level that would meet applicable Federal, State, and local standards. All proposed activities would provide sufficient habitat to maintain viable populations of fish and wildlife. Critical habitat for threatened or endangered species would be protected through avoidance. The action alternatives would accelerate development of forest habitats that are currently deficient within the analysis area to enhance the diversity of plant and animal communities in the long-term. See discussions under the applicable resource sections above, for further support that proposed activities that would comply with the seven requirements associated with vegetative manipulation (36 CFR 219.27(b)), riparian areas (36 CFR 219.27(e)), and soil and water (36 CFR 219.27(f)).

Forest Plan Consistency – Actions analyzed in the Goose FEIS are consistent with a broad range of Forest Plan Standards and Guidelines that have been discussed and disclosed throughout the document. The timber stand treatments associated with the project are consistent with the goals and management direction analyzed in the Willamette National Forest Land and Resource Management Plan FEIS and Record of Decision. Road improvements are designed to be consistent with the 1994 Northwest Forest Plan amendments to the Forest Plan and the Aquatic Conservation Strategy objectives.

Northwest Forest Plan Aquatic Conservation Strategy - The Aquatic Conservation Strategy (ACS) is an integral part of the Northwest Forest Plan and was developed to maintain and restore the ecological health of watersheds and aquatic ecosystems on public lands through implementation of four components: 1) riparian reserves 2) key watersheds 3) watershed analysis 4) watershed restoration. Based on the analysis presented in this FEIS and Appendix E, the ACS Objectives would be met in each alternative.

The Preservation of Antiquities Act, June 1906 and the National Historic Preservation Act, as amended, October 1966 – Section 106 of the National Historic Preservation Act (NHPA) of 1966 (amended in 1976, 1980, and 1992) is the foremost legislation governing the treatment of historic properties (a.k.a. heritage or cultural resources) during project planning and implementation. Other legal framework considered the effects of its actions on heritage resources is listed below:

- 36 CFR800 (Protection of Historic Properties),

- 36 CFR 63 (Determination of Eligibility to the National Register of Historic Places), and
- 36 CFR 296 (Protection of Archaeological Resources), and
- Executive Order 13007 – Sacred Sites

The 1995 Programmatic Agreement (PA) among the USDA Forest Service PNW, the Advisory Council on Historic Preservation, and the Oregon State Historic Preservation Officer (SHPO) Regarding Cultural Resource Management in the State of Oregon by the USDA Forest Service, (amended in 2004), provides a process by which the Forest Heritage Specialist may certify that the Forest has complied with Section 106 of NHPA for the project.

In accordance with this PA, an appropriate inventory was conducted in July 2009. All known cultural sites in the Area of Potential Effect (project area) were protected by avoidance, resulting in a determination of “No Historic Properties Affected” on November 19, 2014. Documentation was provided by SHPO and copies have been retained in the Forest and District Heritage files.

Clean Air Act Amendments, 1977 – The alternatives are designed to meet the National Ambient Air Quality Standards through avoidance of practices that degrade air quality below health and visibility standards. This project is consistent with by the 1990 Clean Air Act and the 1977 Clean Air Act and its amendments (See Chapter 3.2 and 3.12).

The Clean Water Act, 1987 – This act establishes a non-degradation policy for all federally proposed projects. Compliance with the Clean Water Act would be accomplished through planning, application and monitoring of Best Management Practices (BMPs). Based on the analysis presented in this FEIS, TMDL requirements for the McKenzie Basin would be met in each alternative (See Chapter 3.4).

The Endangered Species Act (ESA), December 1973 – The ESA establishes a policy that all federal agencies would seek to conserve endangered and threatened species of fish, wildlife and plants. Biological Evaluations for plants and wildlife have been prepared, which describes possible effects and impacts of the proposed action on sensitive, and other species of concern that may be present in the project area. A Biological Assessment (BA) was prepared for the northern spotted owl, and for bull trout, and spring Chinook salmon.

Endangered Species Act (ESA) informal consultation with the U.S. Fish and Wildlife Service (USFWS) for Upper Willamette River spring Chinook salmon and Columbia River bull trout was completed during the development of the EA (2009-2010). In March 2010, a final Biological Assessment was submitted to USFWS. A letter of concurrence was received from April 14, 2010 concurring with the determinations in the Biological Assessment (below). No conservation measures were issued. During development of this FEIS, it was determined that no additional consultation was required as only minor changes were made to the proposed action, mostly being more conservative (i.e. larger no-treatment buffers).

Upper Willamette River spring Chinook Salmon (Evolutionarily Significant Unit-ESU)	May Affect, Not Likely to Adversely Affect
Upper Willamette River spring Chinook Salmon (Critical Habitat)	May Affect, Not Likely to Adversely Affect
Upper Willamette River spring Chinook Salmon (Essential Habitat)	Will Not Adversely Affect
Bull Trout (Distinct Population Segment-DPS)	May Affect, Not Likely to Adversely Affect

Bull Trout (Critical Habitat)

May Affect, Not Likely to Adversely Affect

Endangered Species Act (ESA) formal consultation with the USFWS for the Northern Spotted Owl was completed in 2009 and evaluated by the USFWS in the 2009 Biological Opinion (FWS reference 13420-2010-F-0001) signed November 25, 2009. Subsequently, Critical Habitat for the northern spotted owl was modified with the 2012 Critical Habitat Rule. This resulted in reinitiation of consultation and an additional Biological Opinion (FWS Reference Number 01EOFW00-2013-F-0115) that addressed the effects to 2012 Critical Habitat for activities proposed by the Goose project. USFWS issued an additional Biological Opinion with the following determinations on April 22, 2013.

Goose Project

May Affect and Likely to Adversely Affect the Northern Spotted Owl-May Result in Harm to 2 Spotted Owl Sites due to Habitat Modification from Thinning, Underburning, and Disruption, Incidental Take to 5 owls (2 pairs and 1 resident single)

Goose Project

Not Likely to Jeopardize the Continued Existence of the Spotted Owl

Road Construction in Suitable RA32 Habitat within 2012 Critical Habitat (~2 acres or 0.25 miles)

May Affect and Likely to Adversely Affect Critical Habitat

Fuels Reduction Treatments (WUI) in 2012 Critical Habitat (21 acres of suitable and 4 acres of non-habitat)

May Affect, Not Likely to Adversely Affect Critical Habitat

Commercial Thinning in Critical Habitat (dispersal habitat)

May Affect, Not Likely to Adversely Affect, mostly Beneficial Effects on Future Foraging and Nesting/Roosting Habitat in Critical Habitat

Commercial Thinning in Critical Habitat (54 acres of gaps)

May Affect and Likely to Adversely Affect Critical Habitat

Effects due to Disruption

May Affect and Likely to Adversely Affect

Magnuson-Stevens Fishery Conservation and Management Act, 1976 (MSA) – The Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires the identification of habitat “essential” to conserve and enhance the federal fishery resources that are fished commercially. The Pacific Fishery Management Council (PFMC) designated Essential Fish Habitat (EFH) for Chinook, coho, and Puget Sound pink salmon in their Amendment 14 to the Pacific Coast Salmon Plan, issued September 27, 2000. The interim final rule implementing the EFH provision of the MSA (62 FR 66531) requires federal agencies to consult with the National Marine Fisheries Service for any action that may adversely affect EFH. The Goose project is located in the Upper McKenzie River Watershed, which is included in the waters designated as EFH for spring Chinook salmon by the PFMC.

Informal consultation with the National Marine Fisheries Service (NMFS) for Upper Willamette River spring Chinook salmon and Columbia River bull trout was completed during the development of the Goose EA (2009-2010). In March 2010, a final Biological Assessment was submitted to NMFS and a letter of concurrence was received March 30, 2010 concurring with the determinations in the Biological Assessment (listed above under ESA). No conservation measures were issued. During development of this FEIS, it was determined that no additional consultation was required as only minor changes were made to the proposed action, mostly being more conservative (i.e. larger no-treatment buffers).

Federal Mine Safety and Health Act of 1977, Public Law 91-173, as amended by Public Law 95-164. Development of Rock Quarries would conform to the requirements of the act, which sets forth mandatory safety and health standards for each surface metal or nonmetal mine. The purpose for the standards is to protect life by preventing accidents and promoting health and safety.

Inventoried Roadless Areas and Wilderness –No inventoried roadless areas or designated wilderness is within or adjacent to the project area

Prime Farmland, Rangeland, and Forestland – No prime farmland, rangeland, or forestland occurs within the project area.

Survey and Manage Species – The action alternatives comply with the Northwest Forest Plan as amended by the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines. Pre-disturbance surveys were conducted and site management applied consistent with the January 2001 species list.

Management Indicator Species (Aquatic) – The Willamette Forest Plan recognized anadromous and resident salmonids as economically important species and designated them as management indicator species for riparian habitat and water quality. The most common salmonid sport fish that occur on the McKenzie River Ranger District are spring Chinook salmon, bull trout, rainbow trout, and coastal cutthroat trout. The Goose project would maintain and improve habitat conditions for aquatic Management Indicator Species in the project area. Therefore, the Goose project would not contribute to a negative trend in viability of these species.

Management Indicator Species (Terrestrial)– The Willamette Forest Plan recognized elk and deer as economically important species that are commonly hunted, and designated them as management indicator species for winter range. Designated management indicator species for old growth and mature conifers are pileated woodpecker, marten, and northern spotted owl. The bald eagle was selected as a management indicator species for old growth conifers near large bodies of water, and the peregrine falcon was selected as a management indicator species for cliff nesting habitat. The Goose project would maintain habitat conditions for elk, deer, pileated woodpeckers, marten, bald eagles and peregrine falcons in the project area. The Goose project would not contribute to a negative trend in viability for any of the terrestrial wildlife management indicator species.

Executive Orders 11988 and 11990: Floodplains and Wetlands – Executive Order 11988 requires government agencies to take actions that reduce the risk of loss due to floods, to minimize the impact of floods on human health and welfare, and to restore and preserve the natural and beneficial values served by floodplains. Proposed harvest treatments would not occur within 100-year floodplains. Executive Order 11990 requires government agencies to take actions that minimize the destruction, loss, or degradation of wetlands. Streamside riparian areas, seeps, springs, and other wet habitats exist in the project area. These areas would be either avoided, or managed according to the amended Willamette Forest Plan Standards and Guidelines. Riparian Reserves would also be protected with design features. As

a result, proposed treatments in Riparian Reserves would be consistent with Executive Orders 11988 and 11990.

Executive Order 12898: Environmental Justice – Executive Order 12898 requires that federal agencies adopt strategies to address environmental justice concerns within the context of agency operations. With implementation of either action alternatives, there would be no disproportionately high and adverse human health or environmental effects on minority or low-income populations. Nearby communities would mainly be affected by economic impacts connected with contractors implementing harvest, road reconstruction, tree thinning, planting, and other fuels treatment activities. Racial and cultural minority groups could also be prevalent in the work forces that implement activities. Contracts contain clauses that address worker safety.

Executive Order 12962: Recreational Fishing – The June 7, 1995, Executive Order requires government agencies to strengthen efforts to improve fisheries conservation and provide for more and better recreational fishing opportunities, and to develop a new policy to promote compatibility between the protection of endangered species and recreational fisheries, and to develop a comprehensive Recreational Fishery Resources Conservation Plan. Proposed activities in the project area would promote the restoration of riparian function in stands in corridor and headwater aquatic reserves and to develop additional large wood to stream reaches that currently lack adequate amounts. This would improve fish habitat and would provide better future fishing opportunities for the public.

Executive Order 13186: Migratory Birds – Migratory birds are protected under the Migratory Bird Treaty Act of 1918 (16 U. S.C. 703-704). The U.S. Fish and Wildlife Service is the lead federal agency for managing and conserving migratory birds in the United States. However, under Executive Order (EO) 13186, all federal agencies are charged with the conservation and protection of migratory birds. A Memorandum of Understanding (MOU 2008) between the Forest Service and U.S. Fish and Wildlife Service requires, during NEPA planning, that the FS, to the extent practical, evaluate and balance long-term benefits of projects to migratory birds against any short- or long-term adverse effects. It also requires the FS to consider approaches, to the extent practical, for identifying and minimizing take of migratory birds that is incidental to otherwise lawful activities. Region 6 has compiled some information to assist biologists in disclosing effects to avian species during NEPA planning (Forest Service and Bureau of Land Management 2013). Effects to FS sensitive birds, federally ESA listed birds, birds that are Management Indicator Species and migratory bird species that have been identified by USFWS as Species of Conservation Concern in the Northern Pacific Forest (USFWS 2008) and that have habitat in the proposed treatment units are addressed in Chapter 3.

Seasonal restrictions are recommended in the Goose design features (Table 13) to conduct hazard tree falling outside the critical nesting season, as well as tree felling, yarding and prescribed unit underburning on specific units to protect owls. This would minimize disturbances to nesting migratory birds and reduce the likelihood of harm to individual birds. Design features to retain existing snags where possible, and to retain live trees, create snags, and fall trees for dead wood sources would provide structural features migratory birds would use. There is a design feature (Table 13) to consider late winter or fall for prescribed underburning which would reduce impacts to nesting birds and their young.

Executive Order 13443: Facilitation of Hunting Heritage and Wildlife Conservation – August 17, 2007, Executive Order requires Federal agencies “to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat.” The proposed creation and enhancement of early seral habitat in both action alternatives in the project area would improve forage for game species and provide better hunting opportunities for the public.

Other Jurisdictions – There are a number of other agencies responsible for management of resources within the project area. The Oregon Department of Fish and Wildlife is responsible for management of fish and wildlife populations, whereas the Forest Service manages the habitat for these animals. The Oregon Department of Fish and Wildlife has been contacted regarding this analysis and Brian Wolfer, a biologist with the agency, attend a 2014 public meeting.

Proposed harvest treatments within riparian areas have been designed to comply with “Sufficiency Analysis for Stream Temperature – Evaluation of the adequacy of the Northwest Forest Plan Riparian Reserves to achieve and maintain stream temperature water quality standards” (USDA Forest Service and USDI BLM, 2004). This document was prepared in collaboration with Oregon Department of Environmental Quality and United States Environmental Protection Agency to provide documentation of Northwest Forest Plan compliance with the Clean Water Act with regard to state water quality standards for stream temperatures. As such, it redeems several of the Forest Service responsibilities identified in a “Memorandum of Understanding between USDA Forest Service and Oregon Department of Environmental Quality To Meet State and Federal Water Quality Rules and Regulations” (USDA Forest Service and Oregon DEQ, May 2002). The Sufficiency Analysis provides current scientific guidance for management of riparian vegetation to provide effective stream shade, including appropriate methods of managing young stands for riparian objectives other than shade, such as production of large wood for future recruitment.

Oregon Department of Environmental Quality and the Oregon Department of Forestry are responsible for regulating all prescribed burning operations. The USDA Forest Service Region 6 has a Memorandum of Understanding with Oregon Department of Environmental Quality, Oregon Department of Forestry, and the USDI Bureau of Land Management regarding limits on emissions, as well as reporting procedures. All burning would comply with the State of Oregon's Smoke Management Implementation Plan and, for greater specificity, see the memorandum of understanding mentioned above.

Segments of the McKenzie River are designated Oregon State Scenic Waterway, which is administered by the Oregon State Parks and Recreation Department. The State Scenic Waterway segments have a dual classification, with the west side of the McKenzie River classified as Scenic River Area and the east side of the river classified as Recreation River Area. Scenic Waterway Act and Commission rules require the evaluation of proposed development within ¼ mile from each side of the river. Approval for timber harvest or salvage within this scenic waterway was requested May 29, 2012 and granted by Oregon State Parks and Recreation on September 28, 2012.

Energy Requirements and Conservation Potential – Some form of energy would be necessary for projects requiring use of mechanized equipment. Commercial thinning and some partial cutting units would involve both heavy and small machines for yarding logs during the implementation period. Projects such as road reconstruction and maintenance could require heavy machinery for a small amount of time. Both possibilities would result in minor energy consumption. Alternatives that harvest trees could create supplies of firewood as a by-product, which would contribute to a supply of energy for the local community for home heating.

Pre-Decisional Administrative Review (Objection)

This *draft* Record of Decision is subject to pre-decisional administrative review (objection) pursuant to 36 CFR 218.

Who may file an objection (36 CFR 218.5): Only individuals, or organizations that submitted specific written comments during any designated opportunity for public participation (scoping or public comment periods) may object.

Objection requirements (36 CFR 218.8): An objection must meet all of the requirements described in 36 CFR 218.8:

- a) Objections must be filed with the reviewing officer in writing. All objections are available for public inspection during and after the objection process.
- b) Incorporation of documents by reference is not allowed, except for the list of items in 36 CFR 218.8 that may be referenced by including date, page, and section of the cited document, along with a description of its content and applicability to the objection. All other documents must be included with the objection.
- c) Issues raised in objections must be based on previously submitted specific written comments regarding the proposed project or activity and attributed to the objector, unless the issue is based on new information that arose after the opportunities for comment. The burden is on the objector to demonstrate compliance with this requirement for objection issues.
- d) At a minimum, an objection must include the following:
 - (1) Objector's name and address as defined in §218.2, with a telephone number, if available;
 - (2) Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the objection);
 - (3) When multiple names are listed on an objection, identification of the lead objector as defined in §218.2. Verification of the identity of the lead objector must be provided upon request or the reviewing officer will designate a lead objector as provided in §218.5(d);
 - (4) The name of the proposed project, the name and title of the responsible official, and the name(s) of the national forest(s) and/or ranger district(s) on which the proposed project will be implemented;
 - (5) A description of those aspects of the proposed project addressed by the objection, including specific issues related to the proposed project; if applicable, how the objector believes the environmental analysis or draft decision specifically violates law, regulation, or policy; suggested remedies that would resolve the objection; supporting reasons for the reviewing officer to consider; and
- (6) A statement that demonstrates the connection between prior specific written comments on the particular proposed project or activity and the content of the objection, unless the objection concerns an issue that arose after the designated opportunity(ies) for comment.

Timeline for filing of objections (36 CFR 218.9): Evidence of and responsibility for timely filing is described in 36 CFR 218.9. Objections must be postmarked or received by the Reviewing Officer, Forest Supervisor, within 45 days from the date of publication of notice of the objection period in the *Eugene Register Guard*, the newspaper of record for the Willamette National Forest. The publication date in the *Eugene Register Guard* is the exclusive means for calculating the time to file an objection. Those wishing to file an objection should not rely upon dates or timeframe information provided by any other source.

Submitting an objection: Objections may be submitted in the following ways:

Electronic Submission: Electronic objections will be accepted through the Forest Service online comment system available at <https://cara.ecosystem-management.org/Public/CommentInput?project=45853>

Mail: Objections can be mailed to the Reviewing Officer at the address below. Objections delivered by mail must be received before the close of the fifth business day after the objection filing period.

Forest Supervisor, Reviewing Officer
Willamette National Forest
Attention: Objections
3106 Pierce Parkway, Suite D
Springfield, Oregon 97477

Hand delivery: Objections may be hand delivered to the Springfield Interagency Office at at the address above between 8:00am and 4:30pm, Monday through Friday except legal holidays

Implementation

If no objections are filed, my decision will be finalized (signed) and implementation of my decision may occur on, but not before, the fifth business day following the end of the 45-day objection-filing period. If an objection is filed, a written objection response will be completed by the Reviewing Officer within 45 to 75 days after the end of the 45-day objection-filing period. At that time, my decision will be finalized (signed) and implementation could begin immediately thereafter.

Contact Person

For additional information concerning this decision or the Forest Service objection process, contact: Elysia Retzlaff, NEPA Planner at 541-822-7214 or elysiamretzlaff@fs.fed.us.

218 Draft
(Record of Decision has not been signed)

Terry Baker
District Ranger, Responsible Official
McKenzie River Ranger District
Willamette National Forest

Date