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Subject: Tethered Ground-Based Logging Guidance

To: Letter to File

To accomplish sustainable long-term landscape management that meets the needs of current and future generations we must always assess our management approach and adapt our methods accordingly. Just as the landscape is dynamic and changes over time, the tools we have to manage and steward the national forest also develop as new technologies become available. In addition to reviewing potential management tools, we must consider the long-term productivity and sustainability of our natural resources to ensure wise use and stewardship of the National Forest.

Staff from the Umatilla National Forest and the Regional Office recently completed an in-depth and thoughtful review to evaluate the relationship between the Umatilla National Forest Land and Resource Management Plan (Forest Plan), Regional guidance, and use of tethered harvest systems. This review resulted in a comprehensive understanding of the requirements and intent behind the management direction in the Forest Plan.

The attached white paper on Tethered Ground-Based Logging on the Umatilla National Forest summarizes these findings and provides guidance on how to evaluate potential new approaches so we can ensure they are supported by our guiding documents and policies, while also meeting resource protection needs.

Based on this review, Forest Service staff determined tethered logging may be used on steep slopes as long as its use is consistent with forest-wide and management area standards and guidelines of the Forest Plan. When implemented, all appropriate safety and site-specific mitigation measures should be utilized to ensure Forest Plan compliance and resource protection.

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Enclosure: Tethered Ground-Based Logging Guidance





White Paper

Tethered Ground-based Logging on the Umatilla National Forest

Tethered Logging Review. Stewarding the 1.4-million-acre Umatilla National Forest for current and future generations requires managers to adhere to relevant Forest Plan and other guidance. Additionally, it is prudent for managers to stay abreast of emerging and established technologies to sustainably manage the landscape.

Tethered, ground-based logging is one such technology that shows promise in ability to treat on steeper slopes while still achieving resource protection objectives. This can potentially allow treatment in areas that were not previously feasible and thus constituted a forest health and wildfire risk. Tethered, ground-based logging can potentially increase the acres treated and move the landscape toward desired conditions and contribute to agency objectives.

Staff in the SO recently completed a review of regional guidance as well as our forest plan to determine whether tethered ground-based logging methods are consistent with these documents.

This white paper examines whether use of cable-assisted, ground-based equipment tethered to an anchor on steeper slopes is consistent with the 1990 Umatilla National Forest Land and Resource Management Plan as amended (Forest Plan) and regional guidance.

1990 Umatilla Forest Plan. Forest plan management direction (goals; desired future conditions; objectives; forest-wide standards and guidelines; management area goals, desired conditions, standards, and guidelines; and monitoring) were reviewed as were forest plan amendments.

Based on this review, management direction in the forest plan, as amended, does not directly or explicitly restrict or prohibit ground-based logging (untethered or tethered) based on topographic slope.

As example, the Forest Plan section on Management Areas Standards and Guidelines on Timber provides the following guidance on in section E1, page 4-180: "All types of logging systems are permitted in order to meet resource objectives." The Forest Plan itself does not directly restrict ground-based logging methods based on slope, however, it is still essential to meet resource protection measures for each management area to maintain the long-term sustainability of the landscape. Thus, the management direction from the Plan and from ESA consultation to protect soil productivity, water quality, and fish habitat may provide other site-specific restrictions on the use of ground-based (tethered or untethered) equipment. IDT specialists may recommend relevant, science-based mitigation measures to reduce unwanted environmental impacts of a proposed action or alternative. All mitigation measures are subject to review and approval by the responsible official.

Forest Plan final environmental impact statement (FEIS). The FEIS Appendix Volume II, Appendix E describes some of the measures considered to reduce programmatic and future project specific impacts described in the FEIS alternatives. The mitigation measures found in Appendix E, pages E-24 through E-32 were incorporated from the R6 1988 Managing Competing and Unwanted Vegetation program FEIS (page II-83 through II-112). These mitigation measures (pages E 24-32) were provided as examples and <u>are not</u> management direction in the Umatilla Forest Plan, such as a goal, standard, or guideline.

White Paper

Tethered Ground-based Logging on the Umatilla National Forest

Mechanical mitigation measure 1 regarding slopes exceeding 35 percent from FEIS Appendix E (page 28) has been previously interpreted by some to mean the measure should apply to all future projects on the Umatilla National Forest. This interpretation is inaccurate because the measures in Appendix E pages E-24 through E-32 were examples to apply following vegetation management projects (e.g., timber harvest, clearing for roads etc.). The measure was intended to be included in project level NEPA, as site preparation prior to reforestation, to address anticipated competing and unwanted vegetation that might interfere or suppress seedling growth and survival.

Regional Guide. The staff also evaluated the 1984 Regional Guide for PNW Region 6. The guide included restrictions to ground based logging under varying slopes to maintain soil productivity and water quality. However, the guide is not applicable because it was withdrawn in the Federal Register November 28, 2001, consistent with the 2000 planning rule (36 CFR 219.35(e)).

2005 Invasive Plant Program FEIS and ROD. Additionally, the staff found that the 2005 ROD (page 2) released all national forests in the region from direction established by the 1988 Record of Decision for Managing Competing and Unwanted Vegetation and the 1989 Mediated Agreement for invasive plant management.

Conclusion

After a robust review of current and historical documents, there are no Regional NEPA decisions or guidance and no management direction in the Umatilla National Forest Plan that directly or explicitly restrict or prohibit ground-based logging (untethered or tethered) based on topographic slope.

Responsible officials will continue to apply mitigation, as appropriate, to maintain project consistency with forest plan management direction and other relevant law, regulation, and policy.

Based on this information Rangers and Staff may consider the use of ground-based, tethered logging technology on steeper slopes. Use of appropriate safety measures by our operators and sale administrators is expected, as well as application of appropriate site-specific mitigation measures in our project NEPA decisions to maintain consistency with our forest plan.