



United States  
Department of  
Agriculture

January 2004

*Type of Document:* **Decision Memo**

*Project:* **Ironton Heavy Fuelwood  
Reduction**

*Administrative Unit:* **Ironton Ranger District  
Wayne National Forest  
USDA – Forest Service**

*Geographic Location:* **Lawrence and Gallia Counties,  
Ohio**

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## **I. Decision to be implemented**

### **A. Description of Decision**

I have decided to implement the Ironton Heavy Fuelwood Reduction Project. This project is in response to damage to vegetation caused by a severe ice storm during the weekend of February 15, 2003. The damage has created a fire hazard on Forest Service land close to private land and structures.

The Forest Service proposes to reduce high fuel loads on nine areas, totaling approximately 930 acres, on the Ironton Ranger District. These fuels consist of dead and dying hardwood trees which were damaged during an ice storm in February 2003 that affected approximately 47,000 acres on the Ironton district. Dead trees, both standing and down, can cause wild fires to be larger and more intense, and make fire fighting more difficult and dangerous.

The nine areas to be treated were selected because they were heavily damaged by the ice storm, are located within 0.5 mile of private property (which could be threatened by any fires on the Forest Service land) and because they have good access and are large enough to provide a merchantable timber sale.

The proposed action would involve removing merchantable trees over six inches in diameter that are already down or are standing and have less than 25% live crown. Research indicates that trees with less than 25% live crown will likely die within a few years. The trees would be sold via a commercial timber sale. A small number of healthy trees would also probably need to be removed in order to build temporary roads and log landings. Approximately 7.4 miles of temporary roads would be needed, but 7.1 miles already exist, so only 0.3 mile would require new clearing (totaling 0.7 acre for 0.3 mile of road, 20 feet wide). About 25 log landings would be needed, 16 of which would require new clearing (totaling 8 acres for 16 landings, averaging 0.5 acre each).

Non-merchantable woody material and logging slash would be lopped and scattered and/or placed in piles. Some of this material may also be prescribe burned, either broadcast or in piles. No log skidding would occur in streambeds, on steep slopes, or within 50 feet of waterholes or rock outcrops. Both during and after project completion, temporary roads and log landings would be stabilized as needed, with water bars, straw bales, seed/mulch, etc. The roads would be closed to vehicular traffic, except for the 0.6 mile in Area 301 which follows a designated ORV trail.

Merchantable timber would be cut and removed as soon as soil conditions permit heavy logging equipment on the sites.

<b>Table 1-1: Ironton Heavy Fuels Reduction Project</b>			
<b>Hazardous Fuels Treatment Areas</b>			
<b>Area</b>	<b><u>USGS Quad Sheet</u></b>	<b><u>Legal Description</u></b>	<b><u>Acres</u></b>
101	Gallia	T4N R18W, Section 26 & 27	231
103	Gallia	T4N R18W, Sections 26 & 35	199
105	Gallia	T4N R18W, Section 26 T3N R18W, Section 1	57
107	Gallia	T5N R17W, Sections 5 & 8	27
109	Gallia	T5N R17W, Section 9	24
110	Gallia	T5N R17W, Section 9 & 10	16
203	Sherritts	T3N R18W Sections 12 & 13	50
204	Sherritts	T3N R18W Sections 13, 14, 23 & 24	226
301	South Webster	T4N R18W, Section 27	97
<b>TOTAL</b>			<b>927</b>

In order to reduce the hazard and protect heritage and biological resources, the following mitigations will occur:

### **Mitigations as Part of the Proposed Action**

Mitigations generally apply to all of the treatment areas, although some, as noted below are specific to one area.

- At least 8 standing dead trees with a diameter between 9 and 20 inches will be left per acre to help protect the Indiana bat, and its habitat. Also, all shellbark and shagbark hickory trees and hollow trees will be left when possible, and temporary roads, log landings and skid trails will be located so as to require the removal of as few trees as possible. Root wads will remain on site.
- If rattlesnakes or dens are discovered during project work, all activities should stop until a wildlife biologist can evaluate the situation.
- Limbs will be bucked where they lie in treatment areas. This woody material will be lopped and scattered to lie within 2 feet of the ground. Entire lengths of merchantable trees, after the limbs are removed, will be skidded to landings where possible.
- Forest Service contract administrators will designate the locations of all skid trails, landings, and temporary road locations to minimize soil disturbance and the number of trees to be cut.

- No skidding will occur within a fifty-foot radius of rock shelters and/or within fifty feet of the base or top of a naturally-occurring large rock face or outcrop. Rock outcrops are fifteen feet or more in height and one hundred feet or more in length. These areas may include discontinuous rock faces, so long as the outcrop area is predominantly a rock face.
- Logging debris will not be permitted in the intermittent stream channels unless planned to benefit fisheries habitat or protect riparian values. Treetops inadvertently felled into stream channels measuring less than eight feet wide at the bottom may be permitted to remain.
- Activities that do not expose potentially damaging amounts of mineral soil are permitted within the filter strip. Special techniques may be used if soil disturbing activities do occur within filter strips including; placement of straw bales in ditch lines and small drainages, leaving berms in road embankments during construction, diversion ditches, hand placement of slash and un-merchantable logs across slopes and trails, installation of check dams in ditch lines, and excavation of sediment detention basins.
- Roads and log skidding will not be allowed within streambeds and will only be allowed across streams at FS designated crossings. A 50-foot undisturbed filterstrip will be maintained around waterholes where possible. There will be no skidding within 50 feet of rock outcrops. Constructed skid trails will not normally exceed a 35% gradient. Both during and after project completion, temporary roads and log landings would be stabilized as needed with water bars, straw bales, seed/mulch, etc. The roads would be closed to vehicular traffic at the completion of the removal activity.
- No healthy umbrella magnolia or butternut trees should be removed.

Area specific mitigations include:

- Areas 105 and 203 contain openings with good butterfly habitat. These openings should not be used as log landings for this project. Clearing brush from roadsides and creating new openings could increase the amount of suitable butterfly habitat.
- Area 109 is within the Caulley Creek Special Area which was designated due to the presence of a Mixed Mesophytic Forest. Specialists reviewed the conditions on site and determined that downed and damaged trees can be removed. Vehicles will be washed before entering the area, skid trails will be obliterated, disturbed areas will seed naturally, and no prescribed burning will occur on this site (Project File C-18 and C-19).
- Several treatment areas have buried archaeological sites within or adjacent to the units. These sites will be marked for avoidance during road maintenance and harvest activities.
- Archaeology monitors will be on-site during project activities to survey areas not accessible due to heavy debris loading. Monitors will recommend that activities cease if any evidence of archaeological sites is found during operations.

Maps showing the treatment areas appear at the end of this memo. Detailed maps of the individual treatment areas are in the Project File and are available upon request.

## **B. Purpose of Decision**

A severe ice storm occurred in southeastern Ohio on the weekend of February 14, 2003, affecting over 40,000 acres on the Ironton Ranger District of Wayne National Forest. The interpretation of aerial photographs and on-ground inventories have indicated nine (9) areas that cumulatively total approximately 930 acres on the District have a significant amount of tree damage from the storm. Some entire trees were completely uprooted, numerous treetops and limbs were broken off the remaining trees from the weight of the ice, and many trees split in two.

Whole trees now on the ground plus fallen limbs and treetops have significantly added to the normal fire fuel loading. Many trees in the damaged area have had their crowns broken from the weight of the ice. Northeast Forest Experiment Station scientists predict that if a tree has less than 25% of its crown left, it will likely die within the next few years. Dead trees can cause hazards in a wildfire in at least three ways:

- 1) a standing dead tree easily catches on fire, then spreads burning embers into the air that start new fires far in advance of the existing fire;
- 2) dead trees are often hollow or filled with decaying wood which burns easily; a dead tree will burn through quickly and fall without warning; many firefighter injuries and deaths have occurred from burning dead trees that suddenly fall onto firefighters;
- 3) these trees will eventually fall, creating higher fuel loads and suppression hazards than exist now.

The present situation presents both fire behavior and safety concerns. The extreme levels of fuel loading from storm-damaged timber increase the predicted intensity of fire in these areas. Small diameter debris creates a ladder for a wildfire to climb to the crown of standing trees. Standing dead trees create hazards to firefighters. The difficulty in establishing control lines would cause the need for firefighters to back off and establish control lines further from the actual fire. There is the potential for more acres to be burned in wildfires and for an increased risk of accidents to the crew attempting to suppress the wildfires.

Wildfire occurrence in the Ironton District over the last 10 years ranges from 9 fires in 1996 to 86 fires in 2001. A total of 865 acres on Wayne National Forest was burned by wildfire in 2001. With the interspersed ownership of private and federal land in the vicinity of the Wayne NF and the suppression problems and expected fire behavior described above, there is a greater chance that more fires will spread from federal to private land unless the areas with extremely high fuel concentrations are treated. Reducing the fuels and minimizing wildfire suppression difficulties will lower potential rates of fire intensity and possibilities of fire spreading onto private property.

## **C. Alternative Actions Considered but Dismissed**

As the storm-related fuel build-up was being assessed, the interdisciplinary team discussed the possibility of taking no action. The fire history in the Ironton area (up to 80 fires in one season), the proximity of private land including residences, the potential damage to habitat for endangered species and heritage resources, and the inability to control fires in the damaged area caused this alternative to be eliminated.

It was considered to buck and scatter both large and small woody debris on the treatment sites. The large woody debris would deteriorate faster on the ground, but this alternative would not

adequately reduce potentially extreme fire behavior, nor would it reduce the hazards to controlling wildfire in the area. This type of treatment would also be very costly.

## **II. Reasons for Categorically Excluding the Decision**

Decisions may be categorically excluded from documentation in an environmental impact statement or environmental assessment when they are within one of the categories identified by the US Department of Agriculture in 7 CFR part 1b.3 or one of the categories identified by the Chief of the Forest Service in Forest Service Handbook (FSH) 1909.15 sections 31.1b or 31.2, and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative effect on the quality of the human environment.

The Department of Interior and Agriculture reviewed over 3,000 hazardous fuels reduction and rehabilitation/stabilization projects completed between FY 1998 and 2002 in order to determine the environmental impacts of these activities. The result of this study was that, in the absence of extraordinary circumstances, these types of activities do not result in significant cumulative effects on the human environment, and therefore, should be categorically excluded from further documentation.

I have concluded that this decision is appropriately categorically excluded from documentation in an environmental impact statement or environmental assessment as it is a routine activity within a category of exclusion and there are no extraordinary circumstances related to the decision that may result in a significant individual or cumulative effect on the quality of the human environment. I find this project was developed in a collaborative framework as described in the 10-Year Comprehensive Strategy Implementation Plan, and that the project is within the wildland-urban interface. The project is also in compliance with the Wayne Forest Plan. My conclusion is based on information presented in this document and the entirety of the Project File.

### **A. Category of Exclusion**

The activity falls with the categorical exclusion category 31.2, number 10, which states: "Hazardous fuels reduction activities using prescribed fire not to exceed 4,500 acres, and mechanical methods for crushing, piling, thinning, pruning, cutting, chipping, mulching, and mowing, not to exceed 1,000 acres." (Forest Service Handbook 1909.15, Environmental Policy and Procedures, Interim Directive (ID) 1909.15-2003-1). This category was published in the Federal Register June 5, 2003 and was effective immediately.

### **B. Relationship to Extraordinary Circumstances**

The mere presence of one or more of the following resource conditions does not preclude use of a categorical exclusion. It is the degree of the potential effect of a proposed action on these resource conditions that determines whether extraordinary circumstances exist.

#### **1. Threatened and Endangered Species or Their Critical Habitat**

The Endangered Species Act requires that federal activities do not jeopardize the continued existence of any species federally listed or proposed as threatened or endangered, or result in adverse modification to such species' designated critical habitat. In accordance with Section 7(c) of this Act, a list of proposed, threatened or endangered species that may be present in the project area was provided to the U.S. Fish and Wildlife Service (USFS 2003b, USFS 2003c). In the analysis of impacts from this project, it has been determined and concurred with by USFWS that, if the mitigations are followed, implementing the proposed action should not cause any direct,

indirect or cumulative adverse effects which could jeopardize the continued existence of any Federal Threatened or Endangered Animal Species, or contribute to the loss of viability or cause to move toward federal listing any Regional Sensitive Animal Species, which may occur on the Wayne National Forest.

It was also determined that fuels reduction activities would have no effect on the federally endangered species northern monkshood, small whorled pogonia, Virginia spirea, or running buffalo clover. The activities would also not likely impact the viability, nor trend towards federal listing, any of the Regional Forester Sensitive species including umbrella magnolia, juniper sedge, striped gentian, Bicknell's and Philadelphia panic-grass, rock skullcap, blue scorpion-weed, or pigeon grape.

## **2. Floodplains, Wetlands, or Municipal Watersheds**

There are no floodplains or wetland habitats within the treatment sites. There are no municipal watersheds within the treatment areas.

## **3. Congressionally Designated Areas**

There are no designated wilderness areas, wilderness study areas, or national recreation areas on the Wayne National Forest.

## **4. Inventoried Roadless Areas**

There are no inventoried roadless areas (Roadless Area Review and Evaluation (RARE) II) on the Wayne National Forest.

## **5. Research Natural Areas**

There are no research natural areas in or near the project area. Treatment area 109 occurs within the Caulley Creek Special Area. Mitigations for protection of this area occur on Page 3 of this Memo.

## **6. American Indian native religious or cultural sites**

The Federal government has trust responsibilities to Tribes under a government-to-government relationship to insure that the Tribes reserved rights are protected. Consultation with tribes helps insure that these trust responsibilities are met. The Forest consulted with seven tribes on this project in order to remain informed about Tribal concerns and no tribal concerns were identified. Project activities will be monitored for evidence of native cultural sites.

## **7. Archaeological sites or historic properties or areas**

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effect of a project on any district, site, building, structure, or object that is included in, or eligible for inclusion in the National Register. Section 106 of the National Historic Preservation Act also requires federal agencies to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment.

The Archaeological Resources Protection Act covers the discovery and protection of historic properties (prehistoric and historic) that are excavated or discovered in federal lands. It affords lawful protection of archaeological resources and sites that are on public and Indian lands. The Native American Graves Protection and Repatriation Act covers the discovery and protection of Native American human remains and objects that are excavated or discovered in federal lands. It encourages avoidance of archaeological sites that contain burials or portions of sites that contain

graves through “in situ” preservation, but may encompass other actions to preserve these remains and items.

This decision complies with the cited Acts. Known archaeological sites in two of the treatment areas will be marked for avoidance prior to project implementation. The volume of woody debris on the ground impedes further survey in the remaining treatment areas until implementation, at which time archaeological monitors will be on site with work crews to survey as debris is removed. This process has been established through consultation and a Memorandum of Understanding with the State Historic Preservation Office (see Project File E-1).

## **8. No other extraordinary circumstances related to this project were identified.**

### **III. Public Involvement**

Invitations to comment on the proposed action were mailed to approximately 300 individuals on August 4, 2003. Seven comment letters were received. The scoping letter and map were available on the Wayne National Forest public website. Twenty individuals representing the local communities, wood industry, local government, and the environmental community participated in a field tour of damaged areas on April 21, 2003. Many private residents in the storm-damaged area were visited, and they responded favorably to fuel reduction in the general area. The Ohio Division of Forestry has shared in the planning of this project as its own nearby state properties were similarly affected.

Collaboration with the community is important in selecting areas for treatment and treatment methods. I (Ranger Chrismer) have spoken with the Lawrence County Commissioners, The Gallia County Conservation Club, Community Action, Rotary, the Nature Conservancy, and state employees and stakeholders at Shawnee State Forest about the need for this project. There is overwhelming support for reducing the fire hazard and for economic, commercial removal.

Concerns were raised about habitat in the treatment areas for federally threatened or endangered and Regional Forester Sensitive Plant Species and known heritage sites in two treatment areas. Some members of the public are concerned that removal of the downed woody debris represents an economic opportunity to the local community and want to see commercial removal as an option. Others are concerned that there should be no removal of commercial products from our national forests and no new roads built. Some comment letters recommended utilizing the storm-damaged timber stands to create new early succession habitat.

These comments were used to refine the proposed action and to further identify mitigations to the proposed action. Comments were also used to explore the possibility of extraordinary circumstances and potential effects to those resources. Documentation of how specific comments received were used is shown in the Project File D-11.

### **IV. Findings Required by and/or Related to Other Laws and Regulations**

My decision will comply with all applicable laws and regulations. I have summarized some pertinent ones below.

This project complies with the **National Forest Management Act (1976)** through adherence to guidance in the **Wayne National Forest Land and Resource Management Plan (Forest Plan)**. A Goal in the 1988 Forest Plan is to suppress all wildfire by taking action commensurate with values at risk. Standards and Guidelines for Fire Management recommend that activity fuels

(slash) will be treated to a level commensurate with the allowable fire intensity and rate of spread that meets resource objectives. Wildfire prevention, detection, and suppression, as well as fuels management, including hazard reduction, will be planned, based on an analysis of probable fire location, expected fire intensities, potential net resource value change, and risk to health and safety (USFS 1988). Although no natural event such as the ice storm was foreseen, the treatment of fuel hazards is consistent with this recommendation for similar reasons.

This project is consistent with the **National Fire Plan's Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment 10-Year Comprehensive Strategy Implementation Plan**, in that communication with landowners and government officials generated the urgency for debris clean-up in the near vicinity of private lands in the wildland-urban interface. The resulting project improves suppression capability over more than 900 acres of the heaviest storm-related fuel loading on the Ironton District, it reduces hazardous fuels in the treatment areas near local residences and communities, and it reduces the potential for catastrophic fire so that natural fire can burn without disastrous results. Community input was received through personal contact with local officials and other citizens, a public field tour, mailing to interested parties, and visitation of homes within ½-mile of the treatment areas. Local residents voiced support for the project in order to protect their property improvements. Local officials and industry representatives supported the project and requested that any salvage be made available for commercial removal so as not to deny economic opportunity to the local community.

Endangered, threatened and sensitive species have been considered in this analysis as required by the **Endangered Species Act**. Potential effects of this decision on sensitive species have been analyzed and documented in the Biological Evaluations for Animals (USFS 2003b) and for Plants (USFS 2003c). Mitigations for protection of these species can be found on Pages 2 and 3 of this document.

This decision complies with the **Clean Water Act** by incorporating State of Ohio's best management practices including the treatment of storm debris in streams, requiring logging equipment to stay off steep slopes, the rehabilitation of skid trails, and the closure of access roads.

This decision complies with Section 106 of the **National Historic Preservation Act**. See Section II, Item B7 of this document.

This decision has considered whether projects would disproportionately impact minority or low-income populations as required in **Executive Order 12898: Environmental Justice**. Public involvement occurred for this project, the results of which I have considered in this decision. Public involvement did not identify, nor is this decision expected to adversely impact minority or low-income populations.

The entirety of this document and the Project File supports compliance with the **National Environmental Policy Act**.

## **V. Administrative Review or Appeal Opportunities**

This decision is not subject to administrative review or appeal pursuant to 36 CFR 215.12(f) (published June 4, 2003) which states that decision for actions that have been categorically excluded from documentation in an EA or EIS pursuant to FSH 1909.15, Chapter 30, Section 31 are not subject to appeal.

## **VI. Implementation Date**

This decision may be implemented immediately.

## **VII. Contact Person**

Further information about this decision can be obtained from Ironton District Ranger Gloria Chrismer during normal office hours (weekdays 8 am to 4:30 pm) at the Ironton District Office, 6518 State Route 93, Pedro, Ohio 45659; Phone (740) 534-6500.

## **VIII. Bibliography**

Cramer, Ann. Heritage Evaluation for Ironton Fuels Treatment Area. 01/08/04.

USFS 1988. Wayne National Forest Land and Resource Management Plan.

USFS 2003a, Fuels Analysis for the Ice Storm Damage on the Ironton District, Pedro Ohio. Terrell, Bennie, 4/1/2003.

USFS 2003b, Ice Storm Damage Fuels Reduction Biological Evaluation (Animals), Flegel, Kathy. 4/28/2003.

USFS 2003c, Ice Storm Damage Fuels Reduction in Pine Stands, Botanical Biological Evaluation, Flegel, Kathy and Cheryl Coon. 12/02/2003.

USFWS 2004. Concurrence with findings (letter).

## **IX. Signature and Date**

*/s/Gloria Chrismer*

*January 26, 2004*

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GLORIA CHRISMER  
District Ranger  
Ironton Ranger District

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Date