



5825 N Greeley Ave
Portland, OR 97217
(503) 283-6343

WWW.OREGONWILD.ORG

Portland Eugene Bend Enterprise

10/31/2025

Greg Wanner, District Ranger
Zigzag Ranger District
Mt. Hood National Forest
70220 E Highway 26
Zigzag, OR 97049

Via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=68842>

Subject: Basin Thinning Project Scoping Comments

Dear District Ranger Wanner,

Please accept the following comments from Oregon Wild concerning the Basin Thinning Project (Project) being planned in the Zigzag Ranger District of the Mt. Hood National Forest as described in the project notification dated October 16, 2025 (Project Notification). Oregon Wild represents 20,000 members and supporters who share the organization's mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. Oregon Wild's goal is to protect areas that remain intact while striving to restore areas that have been degraded. This can be accomplished by moving over-represented ecosystem elements (such as logged and roaded areas) toward characteristics that are currently under-represented (such as roadless areas and complex old forest). Oregon Wild appreciates the opportunity to provide scoping comments at this stage in the Project development process.

As described in the Project Notification, the purpose of the Project is to restore selected plantation stands identified as lacking structural diversity, being generally homogenous, dense and slow growing, and more vulnerable to forest health concerns caused by insect and disease. An additional purpose of the Project is to provide forest products. The Project area is approximately 110 acres. The treatment proposed for the Project involves variable density thinning with skips up to two acres, gaps up to 0.5 acres, and thinning from below. Treatment will be accomplished using a combination of non-commercial and commercial activities. Approximately 0.5 miles of temporary roads would be constructed to facilitate the proposed action.

As a preliminary matter, Oregon Wild suggests that an EIS or EA be prepared for this Project. The Forest Service states that the Project falls within a categorical exclusion under the regulatory authority of the Tennessee Valley Authority (TVA) pursuant to 18 C.F.R. § 1318, Subpart C Appendix A (TVA 31). Use of TVA 31 is inappropriate for the Basin Thinning Project. TVA 31 is part of a class of actions that TVA determined do not individually or cumulatively have

a significant effect on the human environment. As stated in the final rule establishing TVA 31, the “TVA completed an internal review of its NEPA procedures and practices and identified the need to revise some of its procedures to more accurately address TVA’s current mission, program areas, or organizational structure.” 85 Fed. Reg. 17434 (Mar. 27, 2020). TVA is a federally owned electric utility corporation supplying power in the southeast United States. The physical environment that TVA services is vastly different than the environment found in the Oregon Cascades. While the TVA found that the action pursuant to TVA 31 would not have a significant impact on the human environment, that analysis was specific to the TVA service area and the same conclusion does not necessarily apply to the Oregon Cascades where the Basin Thinning Project will occur.

Additionally, 7 C.F.R. § 1b.3(c) requires that a USDA subcomponent adopting a categorical exclusion from another agency’s NEPA procedures consult with the agency that established the categorical exclusion to ensure the proposed adoption is appropriate. The Forest Service’s document dated May 12, 2025¹ indicates that

[T]he Forest Service conducted consultation with the NPS and TVA to discuss the adoption of aforementioned categorical exclusions. The Forest Service’ intended uses of all the CEs are consistent with the way these agencies have been relying on these CEs. The Forest Service explained that the agency intends to rely on the CEs to assist with expeditious and efficient natural resource management activities and to amend plans where applicable.

This language does not indicate that the TVA determined the proposed adoption is appropriate for the Forest Service to use. What was the extent of consultation that occurred with TVA, and is there any documentation that would show what consultation occurred? Even if the Forest Service’s intended use of TVA 31 is consistent with how TVA has relied on the categorical exclusion, this does not indicate that TVA 31’s use is appropriate for the Forest Service, especially in the Oregon Cascades which has a vastly different environment than the southeast United States. Accordingly, it is not clear that use of TVA 31 is appropriate and that proposed actions permitted under TVA 31 will not have significant impacts on the environment or that the Forest Service followed the proper procedures for adopting TVA 31. The Forest Service should prepare an EIS or EA for the Basin Thinning Project.

In preparing an environmental analysis, Oregon Wild suggests that the Forest Service consider the following:

1. Thinning in young plantations.

Oregon Wild is generally supportive of thinning that is carefully planned and implemented in young, dense plantations that are accessible from existing roads. While all logging, including

¹ Forest Service. Adoption of Categorical Exclusions Under Section 109 of the National Environmental Policy Act, 42 U.S.C. 4336c. Available at <https://www.fs.usda.gov/sites/default/files/05122025-Notice-to-adopt-timber-EO-CEs.pdf>

thinning in young stands, includes some adverse impacts and trade-offs, it is generally accepted that the benefits of thinning in very young stands outweigh the adverse impacts of logging by creating some beneficial effects. The Northwest Forest Plan recognizes that 80 years is a useful place to draw the line between young stands that are likely to benefit from treatment and mature and old-growth stands that are likely to experience net negative consequences from treatment.

The Project Notification does not indicate what the age classes or species composition of the stands proposed for treatment are. Oregon Wild requests that the Forest Service provide this information. Within the project area, the Forest Service should drop any proposed units that are older than approximately 80 years old because this is the age when many forest stands begin to develop late-successional characteristics such as the formation of heavy limbs and an accumulation of coarse woody debris on the forest floor. If the Forest Service finds that treatment in stands over 80 years of age is warranted, the Forest Service should explain what the stand characteristics are and provide information the Forest Service relies on to support a decision that treatment will lead to development of late-successional characteristics. Thinning in stands older than 80 years old should be analyzed in an EIS or EA for significant impacts on soil, water, wildlife, habitat, and fuels and fire.

In stands younger than 80 years old, thinning should be highly variable with un-thinned clumps, skips, and structure rich gaps. Oregon Wild appreciates that gaps will be limited to 0.5 acres in size and that skips will be up to two acres. Plenty of live and dead trees should be retained while thinning to better mimic natural disturbance processes. Clumps of healthy trees should also be retained throughout the proposed units.

The Project Notification also describes the proposed treatment areas as located in the B2 Scenic Viewshed land allocation under the Mt. Hood Forest Plan. Please describe how the proposed treatment will create or maintain the desired landscape character through time and space as provided in the Mt. Hood Forest Plan.

Overall, additional information about the characteristics of the proposed stands will allow for more specific comments in the future.

2. Impacts to northern spotted owl.

The Forest Service should consider the direct, indirect, and cumulative impacts that the Project will have on northern spotted owl. A portion of the planning area is within designated critical habitat for northern spotted owl, and it appears that at least a portion of proposed unit 1795 is within critical habitat. As such, the proposed action may have significant impacts on the species, and the Forest Service should analyze potential impacts in an EIS or EA.

Several other projects have occurred or are occurring in the Mt. Hood National forest that may prove to have cumulative impacts on the species. In the immediate vicinity of the Basin Project, the Anvil Vegetation Management and Stone Creek Vegetation Management projects are also within critical habitat and may have adverse effects on northern spotted owl. To the northeast, other projects in the forest include Gibson Insect and Disease, South Fivemile Insect and

Disease, 27 Road Fuel Break, Hootnanny Insect and Disease, South Pen Insect and Disease, Grasshopper Restoration, and Gate Insect and Disease. The Forest Service should analyze the impacts that the Basin Project will have on northern spotted owl when considered cumulatively with these additional projects and any other projects the Forest Service is aware of within the Mt. Hood National Forest.

3. Effects of roads.

The Project Notification states that construction of temporary roads, landings, and skid trails would occur concurrently with project implementation, as would maintenance and repair of system roads needed for haul. Temporary roads will follow the existing footprint of old roads to the extent practical, and about 0.5 miles of temporary roads will likely be needed. Roads have numerous detrimental effects on the environment including fragmentation of landscapes, modification of wildfire behavior, increase risk of fire starts, increased likelihood of erosion and risks of landslides, introduction of sediment into waterways, spread of invasive weeds, and introduction of trash. Even “temporary” roads are not truly temporary because the environmental risks and harms remain even after closure. The Forest Service should analyze the impacts that road maintenance and construction will have within the Project area on soil, water, vegetation, wildlife, and fire risk. The Forest Service should also avoid wet weather hauling. Overall, the Forest Service’s road network is already massive and in need of repair, so limiting road construction as much as possible will reduce additional burden on the Forest Service and avoid environmental degradation.

Thank you for considering these comments for the Basin Thinning project.



Pablo San Emeterio
Western Oregon Field Attorney
5825 N Greeley Ave
Portland, OR 97217
(503)283-6343
pablo@oregonwild.org