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Dear Interested Party

The Mt. Hood National Forest is in the early stages of planning for the Lemiti Fuels Reduction Project on the Clackamas River Ranger District. You may have received a letter dated September 21, 2012 with some preliminary information. This scoping letter will fill in some more details.

Background

Over the past decades, parts of Oregon and much of the Western United States have experienced large wildfires that have put many assets and resources at risk, including habitat for threatened or endangered fish and wildlife species, critical infrastructure, soil productivity, aesthetics, clean air and other valued components of forests and communities. In recent years federal land management agencies have been focusing efforts on treating hazardous fuels and restoring the health of forests to minimize the potential impacts of large scale wildfires.

In the project area, large stands of lodgepole pine trees have been killed by mountain pine beetle creating a significant build up of hazardous fuels. There is the potential for lightning or human caused fires to grow large, threatening both federal and Tribal assets. The proximity of these hazardous fuels to Confederated Tribes of Warm Springs land is one particular concern.



Several years ago the Forest attempted to plan a linear shaded fuel break in response to this fire hazard in conjunction with the Confederated Tribes of Warm Springs, to protect tribal resources both on and off the reservation from wildfire. The fuel break project was canceled and the Forest is now considering a different plan focusing on the dead lodgepole pine near Lemiti Butte. The extent of the dead lodgepole covers approximately 2,300 acres of the 3,139 acre planning area.

Most of the project area consists of pure stands of dead lodgepole pine that became established following large stand-replacement fires. Other areas have lodgepole pine interspersed with other conifer species such as mountain hemlock, Engelmann spruce, Pacific silver fir, and western white pine. Currently, the dead lodgepole pine is standing and a thick carpet of young seedlings and saplings have seeded in. The fire hazard is expected to dramatically increase as dead trees fall and young trees continue to fill in at high densities. The predicted fire intensity would present wildfires that are difficult, expensive and dangerous to contain at small sizes. The planning area is the main route for ingress and egress for the Olallie Lake Scenic Area; a popular back country recreation destination to the south of the project area. This poses an increased threat to public safety if Olallie needs to be evacuated. Also there is a high level of concern for firefighter safety in the event of a high-severity wildfire in the area.

Project Area Boundary

The project area encompasses approximately 3,139 acres. It is bound on the east by the Warm Springs Reservation, on the south by Late-Successional Reserve, on the west by the Sisi Wilderness and on the north by a vegetation-type change where there is no lodgepole pine. Extensive stands of pure dead lodgepole pine extend into the Warm Springs Reservation and into the Sisi Wilderness.

Fire Ecology

Lodgepole pine stands typically become highly susceptible to mountain pine beetle mortality between age 60 and 80 and stand-replacement fires typically occur approximately every 100 years. Adjacent areas with mixed conifer stands are also in a fire regime where stand replacement fires are expected. Stand conditions are at the stage where stand-replacement wildfire is imminent. Current land management plans encourage taking steps to minimize the size and intensity of stand replacement fires.

Current and expected conditions that will influence the severity and intensity of a wildfire:

- Most dead lodgepole pine stands have experienced in-growth of high densities of small trees creating a ladder fuels problem.
- Dead lodgepole pine trees will eventually fall to the forest floor, increasing the fuel load, which in turn increases fire intensity.
- Trees in this area, including dead lodgepole pine, are draped with lichens that are highly flammable in the dry season.
- The area has high lightning occurrence and high risk of human caused ignition.

On August 12, 2001, a passing weather front ignited 21 lightning fires. Several lightning fires were extinguished when they were small. However, there were too many fires for the available fire suppression forces and several of the small lightning fires converged into one relatively large stand-replacement fire burning on both National Forest land and the Confederated Tribes of Warm Springs Reservation land. The Olallie Complex of fires was eventually contained at 2,622 acres. A large portion of these acres burned at high intensity. Previous to this fire, there had been no large stand-replacement fires in the area since Forest Service administration began in 1907, largely due to fire suppression efforts.

In August of 2010, a similar wildfire scenario occurred. On August 17th, lightning ignited several fires. Some were contained, but within two weeks other fires burned together and grew in size. These fires experienced dramatic fire behavior due to the extensive dead trees. The View Lake Fire Complex burned approximately 2,100 acres in the area.

On August 4, 2012, a similar wildfire occurred on the Warm Springs Reservation. The Waterfalls 2 fire burned southeast of Olallie Butte and consumed approximately 12,000 acres.

Each of these fires led to evacuations and closures of the Olallie Scenic Area due to concerns on the part of the incident managers for potential of rapid spread of the fire through dead lodgepole stands in the vicinity. Fire modeling has shown that the project area has high fire hazard which will increase when the standing dead trees fall.

Recommendations of Watershed Analysis

The project area is covered by the Upper Clackamas Watershed Analysis (1995). The watershed analysis indicates the area appears to have experienced repeated disturbances from insects, disease and fire which have led to a mosaic of stands with different ages, species and structure.

When the Watershed Analysis was written, the lodgepole pine were alive but there were concerns about fire hazard related to the spruce budworm infestation that was defoliating hemlock and Douglas-fir trees. Spruce budworm infestations are typically tied to drought cycles. While the spruce budworm infestation has waned, populations are likely to build again.

The Watershed Analysis discussed minimizing fire hazard with general recommendations surrounding reducing stocking, salvage and underburning.

Land Allocations

There are several land allocations in the project area. The following is a brief summary of the goals of these land allocations, their existing and desired conditions. The Forest Plan requires an appropriate fire suppression response for all of these land allocations to limit the size of wild fires.

- The **Matrix** land allocations have primary or secondary goals of maintaining healthy stands and providing forest products through a variety of timber management practices.
 - The **deer and elk summer range** (B11) land allocation is designed to provide high quality habitat. Most of the project area is in this allocation. Since most of the trees are dead in this area it is not possible to meet some of the recommendations for cover but there are opportunities to enhance forage.
 - The **roaded recreation** (B3) land allocation has largely been absorbed into the Late-Successional Reserve except for a small section that is now dead. The Watershed Analysis recommends deleting this land allocation. Roaded recreation opportunities have been addressed Forest wide recently through the Off-Highway Vehicle Management Plan and

this area was not selected through that process. While the Forest Plan has not yet been amended to changed this allocation, the proposed actions are consistent with B3 standards and guidelines.

- The **timber emphasis** (C1) land allocation is designed to provide lumber, wood fiber, and other forest products. Timber in this land allocation would be at risk in the event of a large wildfire. The primary need is to increase health and accelerate growth while providing forest products now and into the future. This need is described in the Forest Plan on pages Four-26 & Four-289.
- **Riparian reserves** should contain the level of vegetative and structural diversity associated with mature and late-successional stand conditions; however, most of the riparian reserve trees in the project area are dead. In the project area, the riparian reserve land allocation is overlapped by Key Site Riparian (A9) which has similar objectives. The project area is relatively dry and the streams are fed by snow melt. There are a few small streams that stop flowing in the summer, but they contain pools where resident fish species survive. Riparian values could be harmed in the event of a large wildfire.
- The **unroaded recreation** area (A5) has largely been absorbed into the Sisi Wilderness with the exception of an area that had been thinned several years ago. This area is entirely dead and no longer provides recreational opportunities envisioned by this land allocation.

Collaboration

Beginning in 2006, the Forest began an ongoing dialogue with the Warm Springs Tribes to develop a plan to protect tribal resources both on and off the reservation.

On October 26, 2012, the Forest held a public field trip explaining the project and gathering feedback.

On November 11, 2012, a general overview of the Lemiti Fuels Reduction project was presented to the Clackamas Stewardship Partners, a local collaborative group.

Purpose and Need

The purpose of this project is to reduce fuels to minimize resource impacts from fire, provide for enhanced firefighter safety, and treat a sufficient number of acres to meet forest plan goals related to forest product outputs as well as enhance the productive capacity of the forest.

The Forest Plan, as amended, provides integrated resource objectives to enhance the productive capacity of the Forest in order to provide for the sustainability of resources and forest uses.

- There is a need to reduce potential wildfire hazard because of the accumulation of fuels and dead trees that would result in severe burning conditions. In the event of a large wildfire, resources (such as soil productivity, infrastructure, riparian values, LSR, scenery, etc.) would be at risk on both the Forest and the adjacent Confederated Tribes of Warm

Springs Reservation. Additionally, fire suppression tactics would be greatly limited due to high levels of risk to fire suppression personnel in this setting. The accomplishment of this objective will be measured by the amount of hazardous fuels treated and achieving modeled target flame lengths that would increase opportunities for suppression effectiveness.

- There is a need to keep forest stands in the Matrix productive to sustainably provide forest products now and in the future. *This need is described in the Northwest Forest Plan on page 26 and Forest Plan on pages Four-3 & Four-26.* The accomplishment of this objective will be measured by volume of timber and other forest products removed and acres treated in the matrix for long-term forest productivity.

Proposed Action

To meet the needs described above, the Forest proposes vegetation management treatments on approximately 2,300 acres. Fuel treatments would include a mix of actions such as harvesting and removing trees, precommercial thinning, pruning, slash piling and pile burning. Fuels treatments are not intended to eliminate all wildfires but instead would reduce potential fire behavior and spread, and provide for more effective suppression options. Firewood and other forest products would be made available where appropriate.

To accomplish fuels reduction treatments, many roads would be used that require some work. Most haul roads would require some road maintenance or repair including rocking, ditch and culvert cleaning and brushing. Some new temporary roads and some old decommissioned roads would be needed. Approximately 3 miles of new temporary road would be constructed and obliterated after use and approximately 5 miles of roads that were previously decommissioned would be reconstructed as temporary roads and obliterated after use. One previously decommissioned system road requires a temporary bridge to cross Slow Creek.

Some connected actions are also being considered including: seeding of native grass and forb species for deer and elk, creating wildlife trees, replacing undersized culverts and system road decommissioning.

Timber sales, stewardship contracts, and service contracts may be the management tools used to implement the project.

Comments

Some comments have been received as a result of initial scoping efforts and field trips for this and similar projects. Some commenters question the purpose and need and do not believe the hazard or risk are as great as suggested in this document or they believe the impacts of treatment outweigh the impacts caused by a fire. The following is intended to extend the dialogue to others that may have similar questions and concerns.

Why was the earlier fuel break proposal canceled?

The Forest Plan with its standards and guidelines was written at a time when that type of treatment was not anticipated, particularly in the land allocations where traditional logging was not anticipated. The cost of planning such a complex project became insurmountable and the Forest has chosen to pursue the current proposed action instead. Also during the fuel break planning many public comments were received suggesting that we focus on the dead lodgepole pine area instead.

Fire is natural and wildfires should be allowed to burn.

The natural fire regime for the project area is one where large stand replacing fires burn and kill most trees. However past fire suppression, insect mortality in lodgepole pine and the ingrowth of ladder fuels has created a situation where wildfires would burn more intensely and get larger than would have been expected a few decades ago. Large, intense wildfire is not the desired condition for this landscape at this time. The landscape is managed for many human values such as scenery, clean air, recreation, safety and huckleberries. It is also managed to provide habitats for rare species. The Mt. Hood Forest Plan as amended by the Northwest Forest Plan requires an appropriate suppression response for all wildfires in this area to protect these values. Changing the policy to allow fires to burn is outside the scope of this analysis.

With fire exclusion, meadows are becoming smaller and forage and browse which support game and non-game wildlife species has declined. Fire, even “catastrophic fire”, is the best restorer of wildlife habitat and huckleberry resources which usually are most valued by the tribes.

Communications in recent years with representatives of the Confederated Tribes of Warm Springs have indicated that they do not support allowing fires to burn in the project area. There are other means to enhance huckleberries and forage.

Fire return intervals are relatively long and unpredictable in this landscape, so it is unlikely that the area treated to reduce fuels will experience fire and provide the desired benefits during the brief time that treatments may be effective (i.e., before dense young trees regrow). Manipulating fuels to avoid stand replacing fire is unlikely to be successful and may not be an ecologically desired outcome.

Agency fire personnel have experience in this area with suppression of large lightning caused fires in similar fuel types and believe that it is highly likely that this area will experience extreme fire behavior soon, a risk that increases when the dead lodgepole pine begin to fall. Part of the proposed action is to manage the regrowth density to extend the duration of effective fuel treatments. Even with fuel treatments, wildfires are still likely to occur in this area. The intent is to reduce the intensity of a fire so that fire suppression forces can safely operate to keep fires small.

Mountain pine beetles are a native species and from an ecological perspective there is nothing unusual about the local eruption around Lemiti Butte. Patches of forest mortality are a natural feature of dynamic forests. Patches of high mortality provide unique habitat attributes, such as sun-drenched complex woody structure and abundant opportunities for cavity associated species that are less available in green forests or areas that are salvage logged.

Sufficient quantities of snags will be retained in the project area and across the landscape to provide for snag dependent species. Not only have large fires burned leaving many thousands of

acres of dead trees, the lodgepole pine mortality extends into many areas that are not proposed for fuels treatment. The typical cycle of lodgepole pine succumbing to mountain pine beetle and then burning in stand replacing fires has likely occurred in this area for thousands of years. However, allowing wildfires to burn is not the goal for this area at this time. The forest is managed for a wide range of human and resource values and, in the event of a wildfire, suppression forces would be at greater risk protecting these values if no action is taken to moderate the fuels hazard.

Dead trees are required by many cavity nesting animals, and large woody debris which is often removed by salvage logging is essential to almost all animals in the forest. Removal of legacy features from these forests is the same as removing these species' homes and prevents their populations from becoming as stable as they were before fire suppression was forest policy.

Dead lodgepole pine trees are relatively small (4-16 inches diameter) and do not stand very long after dying. These are not considered large snags nor would they result in large woody debris when they fall. Sufficient quantities of snags and down logs will be retained in the project area and across the landscape to provide for species dependent on these habitat features.

The forests that are being affected by the mountain pine beetles will recover, in fact, they are already recovering, and if they are not salvage logged, they will be more complex and more diverse. Complex and diverse old forests are most likely to develop from complex and diverse young forests, not from structurally simplified stands that result from salvage logging.

While seedlings and saplings have begun to grow in this area, they are not likely to survive to maturity if fuels treatments are not completed to reduce the risk of small fires becoming large. In the lodgepole pine stand type, it is very unlikely that stands would transition to old growth because of the cyclic nature of the interaction of beetles and fire.

Fuel reduction should occur in the wildland/urban interface and not deep in the forest where no houses are at risk.

The Forest has undertaken some hazard reduction in the wildland/urban interface. However, this project is designed in cooperation with the tribes to protect the resources in this area. It was developed because large scale wildfires are likely to occur in this area, and when they do occur, Forest and tribal resources would be damaged. It may seem deep in the forest for those coming from Portland, but the project is in the "back yard" of tribal members who live and work there.

There is significant disagreement about fire severity in dead forests. Studies have shown that once needles fall off dead lodgepole pine trees, fires actually burn cooler.

Since most of the needles have fallen from the dead trees in the project area, the primary concern is for the next stage where trees begin to fall. Fuel conditions are expected to become extreme in the next decade with the combination of young seedlings that have already seeded in and hundreds of trees per acre falling in a "jack strawed" manner. Fires burning in this area would be too extreme to suppress with conventional ground crews and they would become large and intense.

The proposed fuel treatment will not stop a wildfire.

The project is not intended to stop a wildfire. It is intended to aid in the suppression of a

wildfire. It would be a place where fire suppression forces could safely work. The intent is to create a situation where fire suppression forces could keep a fire smaller than what would occur with no treatment.

100 years of fire suppression has caused the landscape to be outside its natural range of variability and now fires will burn with unnatural intensity.

Fire return intervals in the project area are not outside the range of natural variability. The project area is in a fire regime that naturally burns with high intensity. However, many years of fire suppression and drought have affected the project area. The dead trees and ladder fuels would result in fires burning even hotter and get even larger than would have been expected a few decades ago. Without fire suppression, the area would likely have burned already and there would be fewer acres of mature and mid-seral forests and it would likely have more newly established young forests.

Logging will increase fire hazard by increasing surface fuel loads from fine woody debris left from salvage logging operations. Funding often does not allow the removal of this type of material after salvage logging has taken place.

This project is not traditional logging. Tree tops, branches and other fuels would be treated to remove the hazard. Fuel modeling and previous experience shows that flame lengths would be approximately four feet after treatment.

East winds the primary driver of extreme fire events in this area, and would drive a fire away from the Warm Springs Reservation instead of toward it.

East winds are not the only concern when fires are burning. Lightning storms in the area come from the southwest. The recent Olallie Lake fire complex and the View Lake Fire burned primarily toward the east driven by westerly winds. Winds can come from multiple directions. The Confederated Tribes of Warm Springs are certainly concerned about fires burning onto the reservation but they are also concerned about smoke and the impact that fires would have to resources on adjacent national forest land. The project area is part of the tribes' usual and accustomed lands where they traditionally hunted, fished and harvested huckleberries, roots and other medicinal plants. There are also culturally and spiritually significant areas that occur on the national forest. Treaties recognize tribal rights to continue with these activities on national forest land.

Most resources of concern to the public in the project area such as wildlife habitat, water quality, and carbon sequestration would be best served by allowing natural ecological process, and avoiding industrial disturbances that would disturb soil and vegetation and disrupt natural processes. Remote places like this are relatively good places to let natural processes play out without significant intervention. Patches of accumulated dead trees are not unnatural in these forests.

Large intense wildfire is not the desired condition for this landscape at this time, as described by the Mt. Hood Forest Plan as amended by the Northwest Forest Plan. The landscape is managed for many human values such as scenery, clean air, recreation and safety. It is also managed to provide for rare species such as spotted owl habitat in adjacent late-successional reserves. The Forest Plan requires an appropriate suppression response for all wildfires in this area to protect these values.

The project area includes some ecologically significant unroaded areas that should be conserved and where natural ecological processes should be allowed to flourish. Unmanaged unroaded areas provide certain important values that are not provided as well in roaded and managed areas.

The Forest has many areas such as Wildernesses where ecological processes and unroaded character occur. The goals for the project area can be achieved with temporary roads to gain access for fuels treatments. These roads would be obliterated upon completion of those treatments.

The project would seem to be marginal in terms of economic feasibility. The dead trees have low value, and slash treatments are expensive. Also these high elevation areas are notoriously difficult places for growing commercially valuable timber.

The Forest is concerned about economic viability and will examine all aspects of the project to make sure they are needed and designed as efficiently as possible. Traditionally, the value of timber removed is relied upon to cover the costs of its removal and other project elements.

Given that this project is a fuels treatment action, the value of the salvaged trees may only cover part of the treatment. The project area is considered suitable for timber management and even though growth rates are slower than in lower elevations, it is likely that trees can be successfully grown there to meet resource needs described for the various land allocations and to provide future timber.

Objection Process

This project will use the new 36 CFR 218 objection process instead of the old 36 CFR 215 appeal process. After a 30-day comment period, an Environmental Assessment will be finalized and a draft Decision Notice will be published. A final Decision Notice can then be signed after a 45-day objection period, following consideration of any objection received. This project does not fit within the requirements of the Healthy Forest Restoration Act of 2003.

Maps of the project area are available on the Forest's web site at <http://www.fs.usda.gov/projects/mthood/landmanagement/projects>

Questions or comments may be directed to:

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I am requesting your comments concerning this project. If you commented already you need not resubmit the same items. If you have any site-specific knowledge or concerns about the area in question, please bring them to our attention. Your input will help us improve the planning and design of the project, and to identify potential issues of concern at the earliest possible stage. Please send us your input by May 15, 2013.

Thank you for your time and interest in the management of the Mount Hood National Forest.

Sincerely,

/s/ Michael Chaveas

MICHAEL CHAVEAS
District Ranger