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Dear Interested Public:

The Barlow and Hood River Ranger Districts on the Mt. Hood National Forest have identified you as an individual, agency, or organization that might be interested in commenting on our Crystal Clear Restoration (CCR) Project, which aims to provide forest products, restore resiliency to forested areas and reduce the risk of uncharacteristic wildfire.

The CCR planning area is located at the southern ends of both the Barlow Ranger District and the Hood River Ranger District (see attached Vicinity Map). This area is bordered to the south by the Confederated Tribes of the Warm Spring Reservation and to the east by privately owned lands. US Highway 26 bisects the planning area from east to west. The project includes parts of the White River, White Horse Rapids-Deschutes River and Beaver Creek watersheds within the Lower Deschutes River sub-basin.

The planning area includes approximately 24,000 acres in:

- Township 4 South, Range 8.5 East, Section 36;
- Township 4 South, Range 9 East, Section 25-29, 31-36;
- Township 4 South, Range 10 East, Section 31;
- Township 5 South, Range 8.5 East, Section 1;
- Township 5 South, Range 9 East, Section 1-15;
- Township 5 South, Range 10 East, Section 3-11, 13-26; and,
- Township 5 South, Range11 East, Section 8, 17-20, 30; Willamette Meridian.

Background

Land management activities since 1855 have altered the frequency, severity, and intensity of natural disturbance events and changed the probable outcomes of these events on public and private land. Over the past 100 years on the Mt. Hood National Forest, historical management activities, fire suppression efforts and favorable climatic conditions have altered vegetation growth resulting in the accumulation of dead fuel, highly dense and homogenous stand conditions throughout much of the planning area.

The high density of the stands contributes to mortality of trees because of competition for nutrients, water and sunlight. Densely stocked non-fire resistant trees, diseased trees, large scale tree mortality areas, and down fuel are creating continuous fuel ladders from the ground to the tree crowns. This has increased the risk of epidemic insect and disease-related morality as well as the risk of uncharacteristic wildfire behavior.

The planning area is in close proximity to several landowners, including the Confederated Tribes of the Warm Springs Reservation to the south. The Warm Springs Wildland Urban Interface (WUI) shares the boundary between the Mt. Hood National Forest and the Warm Springs





Reservation. This WUI was segmented into several compartments in the Wasco County Community Wildfire Protection Plan (CWPP), two of which are adjacent to the CCR planning area: Compartment 1 and Compartment 6.

Compartment 1 is located in the northwest part of the Reservation and adjacent to the westernmost portion of the CCR planning area. It is adjacent to most of the moist mixed conifer treatments. There are no communities in the compartment, but power lines cross it from east to west. Also, the compartment has year-round logging activity, hunting use, and wilderness trails that are used eight months of the year. There are traditional food areas and cultural sites. Compartment 1 was assigned an overall wildfire risk rating of "moderate" in the CWPP primarily because no people live there and it has a low fuel hazard level.

Compartment 6 is the largest compartment in the Reservation and is directly east of Compartment 1 and is adjacent to most of the dry mixed conifer treatments. This compartment contains communities, individual homes, logging, high traffic volumes, campgrounds, wood cutting areas, hunting areas, and power lines. Four of the eight communities identified at risk by the Confederated Tribes of Warm Springs are partially, or completely, within the compartment. The CWPP has assigned this compartment a "high" overall wildfire risk rating based on fuel load hazards, ignition risk, and past fire history.

The Juniper Flats WUI, which is included in the eastern portion of the planning area, is made up of a rural area with scattered farms, ranches, and subdivision development. Light, flashy fuel and frequent down canyon winds often result in fast moving wildland fires. The Pine Grove community is one of the biggest concern for this WUI. This community has a high risk rating based on fire occurrence and a high density of homes. It has the second highest hazard rating of the communities in the Wasco County CWPP. This high score is justified from the type of fuel involved and the crown fire potential. Additionally, limited road access presents a unique risk for home-owners and fire fighters. The community is situated in, and adjacent to, a highly hazardous fuel situation on private and public lands.

In addition to the Wasco County CWPP, in 2012 the Mt. Hood National Forest developed a Strategic Fuel Treatment Placement Plan. This was established to create a strategy to help guide the purpose and need for interdisciplinary projects and to create a forest landscape with a network of fuel breaks and natural openings that would promote the following:

- Increased public and firefighter safety;
- Decreased management costs;
- Increased suppression effectiveness in protecting private and federal improvements, timber and sensitive natural resources; and,
- Disturbances in block sizes representing the natural disturbance regime.

The Strategic Fuel Treatment Plan spatially identifies areas of the forest where buffers and fuelbreaks would help meet the Plan's objectives. In order to help meet these objectives, the Plan recommends the need for a reduction in horizontal continuity of surface fuel and canopy fuel and a reduction to vertical continuity associated with ladder fuel.

The majority of National Forest System (NFS) lands have been mapped as Fire Regime Condition Class 2 or 3, thereby indicating they have missed one or more natural fire events and now contain unnaturally high fuel conditions and are at risk for uncharacteristic wildfires. Fire regimes are a national classification of the historic conditions for fire severity and frequency for a particular environment. Throughout the planning area, these regimes range from fire historically occurring every 0-35 years with low severity in the eastern portions of the planning area, to stand replacing wildfires occurring every 100-200 years in the higher elevation areas in the western portions of the planning area. However, over 85% of the planning area would have historically seen low to mixed severity wildfires.

Purpose and Need

The purpose of the Crystal Clear Restoration Project is to provide forest products where there is an opportunity to restore resiliency to forested areas and reduce the risk of uncharacteristic wildfire behavior.

The need for action for the Crystal Clear Restoration Project area was determined by comparing the existing conditions in the project area with the desired conditions for the project area as identified in the Mt. Hood National Forest Land and Resource Management Plan (Forest Plan), Strategic Fuel Treatment Plan, Wasco County Community Wildfire Protection Plan, White River Late Successional Reserve Assessment, and the White River Watershed Assessment.

The need for action in this project area, consistent with Forest Plan direction, is to promote the overall sustainability of vegetative systems. Sustainability would be enhanced by increasing the resiliency of the area to withstand severe, uncharacteristic fires, or widespread occurrence of mortality from insects and disease.

Existing plantations do not have the mix of tree species that were present historically and they are relatively uniform in terms of tree size and spacing. Sustainability also includes enhancing diversity within plantations, which would be designed to address species diversity and high density issues that are leading to forest health concerns.

Successful long-term development of a sustainable forest depends on facilitating the eventual return of characteristic fire to areas that were historically fire-dependent, and on maintaining stand conditions and fuel conditions that do not contribute to future fires with large-scale stand replacement mortality. This includes providing locations for fire suppression personnel to actively engage a fire safely in areas of high consequence infrastructure areas and the WUI, as well as reducing the impacts of human caused fires spreading to or from public access areas and adjacent landowners.

There is also a need to provide forest products consistent with the Northwest Forest Plan purpose of maintain a sustainable supply of timber and other forest products that would help maintain the stability of local and regional economies on a predictable and long-term basis.

Forest Plan Land Use Allocations

The desired future condition of the planning area is one of resilience to insect and disease mortality and uncharacteristic wildfire behavior, providing locations to actively engage a fire safely. Achieving this desired future condition would meet the overall goals of the land allocations within the planning area, which are further discussed below.

Several land allocations for NFS lands as designated by the Forest Plan, as amended by the Northwest Forest Plan, are found within the planning area (see Table 1 below). The four primary Forest Plan land allocations in the planning area are Key Site Riparian Area (A9), Scenic Viewshed (B2), Deer Winter Range (B10), and Timber Emphasis (C1). An overlapping secondary land use allocation in the planning area, Pileated Woodpecker/Pine Marten Habitat Area (B5), occurs on approximately 460 (3%) of the acres proposed for treatment. Where applicable, the more stringent standards and guidelines would be applied where land use allocations overlap.

Land Use Allocation	Acres of Planning Area (Percent)	Acres of Treatment Area (Percent)
A7-Special Old Growth	22 (0.09%)	0 (0%)
A9-Key Site Riparian Area	414 (2%)	0 (0%)
B1-Wild & Scenic River Corridor	65 (0.2%)	0 (0%)
B2-Scenic Viewshed	9,388 (39%)	5,064 (38%)
B10-Deer Winter Range	3,307 (14%)	2,161 (16%)
C1-Timber Emphasis	10,814 (45%)	6,046 (45%)
B5-Pileated Woodpecker/Pine Marten Overlay	1,568 (6%)	460 (3%)

Table 1. Forest Plan Land Use Allocations in the CCR Planning Area

The main land use allocation of the planning area (approximately 45% of the planning area and treatment area) is within Timber Emphasis (C1) land use allocation. The goal for this land is to provide lumber, wood fiber, and other forest products on a fully regulated basis, based on the capability and suitability of the land. A secondary goal is to enhance other resource uses and values that are compatible with timber production (Forest Plan, pp. 4-289 to 4-290).

Approximately 38% of the planning area and treatment area is within the Scenic Viewshed (B2) land use allocation, as described by the Forest Plan on pages 4-218 to 4-220. The goal for this land use allocation is to provide attractive, visually appealing forest scenery with a wide variety of natural appearing landscape features. This management area should utilize vegetation management activities to create and maintain a long-term desired landscape character. For this project, Highway 26 serves as the main viewer position from which the visual quality objectives are prescribed.

The Deer Winter Range (B10) land use allocation accounts for approximately 14% of the planning area and 16% of the proposed treatment area. The goal for this area includes providing high quality deer and elk habitat and stable populations of mule deer and Rocky Mountain elk.

Secondary goals are to maintain a healthy forest condition through a variety of timber management practices and provide dispersed summer and developed recreation opportunities.

Pileated Woodpecker/Pine Marten Habitat Area (B5) is a secondary land use allocation that overlaps the three primary land use allocations. For the proposed treatment areas, approximately 187 acres of B5 overlap with the Scenic Viewshed land use allocation, and approximately 273 acres of B5 overlap with Timber Emphasis land use allocation. The Goal of this land use allocation it to provide mature or old growth habitat blocks of sufficient quality, quantity and distribution to sustain viable populations of pileated woodpecker. A secondary goal is to maintain a healthy forest condition through a variety of timber management practices.

The Northwest Forest Plan land use allocations overlap the allocations within the Forest Plan. The planning area includes Riparian Reserve (11%), Late Successional Reserve (9%), and the majority of the area is Matrix (80%) (see Table 2 below). Most of the treatments would be located in Matrix (97%) and 3% of the treatments are proposed in the Late Successional Reserve. The Late Successional Reserve (LSR), in combination with other allocations and standards and guidelines, are to maintain a functional, interactive, late-successional and old-growth forest ecosystem.

Land Use Allocation	Acres of Planning Area (Percent)	Acres of Treatment Area (Percent)
Matrix	19,167 (80%)	12,818 (97%)
Late Successional Reserve	2,056 (9%)	453 (3%)
Riparian Reserves	2,769 (11%)	0 (0%)
Administratively Withdrawn	18 (0.07%)	0 (0%)

Table 2. Northwest Forest Plan Land Use Allocations in the CCR Planning Area

An assessment of the White River LSR was completed in 1996 and includes a description of the desired future condition of the eastside zone that the planning area overlaps. This includes "stand structures of Open Park-like, Cathedral and Open Intolerant Multi-story" forest types that will have to "be maintained over time by planned ignition and underburning" (White River LSR Assessment, p. III-1).

Matrix consists of Forest Service lands outside of designated areas (i.e., Congressionally Reserved Areas, Late Successional Reserves, Adaptive Management Areas, Administratively Withdrawn Areas, and Riparian Reserves).

Standards and guidelines in the Forest Plan were not written to specifically address projects that look to implement fuel reduction efforts within pine forest types and overlapping land use allocations. Therefore, in order to meet the project's purpose and need, several "exceptions" to the Forest Plan standards and guidelines may be necessary. "Exceptions" are allowed under the Forest Plan, if they are identified during the interdisciplinary planning process. On page 4-45 of the Forest Plan, it states that for "should" standards "action is required; however, case-by-case exceptions are acceptable if identified during interdisciplinary project planning environmental analyses."

Proposed Action

In order to restore resilience and reduce the risk of uncharacteristic wildfire within the planning area, the proposed action would include thinning unmanaged stands and plantations of varying ages. All thinning activities proposed in this project would apply variable density thinning (VDT), which allows for flexible local density levels to achieve overall treatment objectives. Also, variable density thinning allows for an emphasis to be placed on leaving vigorous trees of all sizes without concern for spacing. Proposed treatment types would occur in either dry or moist mix conifer forest types and would place a greater emphasis in areas that were identified as needed for strategic fuel treatment in the Mt. Hood Strategic Fuel Treatment Plan.

The project includes utilizing system and temporary roads to facilitate implementation. In many cases, temporary roads are located on roads that were closed or decommissioned through a previous planning effort, but never effectively physically closed.

The Mt. Hood Strategic Fuel Treatment Plan spatially identified areas where fuel treatments could be most effective, and were the foundation for the Strategic Fuel Treatments in both dry and moist mixed conifer stands in the planning area. This plan identified areas that would protect high value resources and create fuelbreaks on roads and ridges to:

- Create opportunities for safe and effective fire suppression;
- Add depth to private land boundaries;
- Compartmentalize the landscape into blocks that are spatially representative of natural disturbances;
- Facilitate indirect fire suppression and reduce wildfire costs; and,
- Facilitate landscape restoration that adds depth to fuelbreaks by using fire and other vegetative treatments.

The proposed action also includes various fuel treatments that would be applied when all thinning activities have been completed. This is expected to occur within five years of mechanized treatments. Post-activity assessments would be completed to determine specifically when and where prescribed fire would be applied.

Utilizing the recommendations of the Strategic Fuel Treatment Plan, the proposed action includes four different treatment types:

- 1) Strategic Fuel Treatment in Dry Mixed Conifer
- 2) Forest Health Treatment in Dry Mixed Conifer
- 3) Strategic Fuel Treatment in Moist Mixed Conifer
- 4) Forest Health Treatment in Moist Mixed Conifer

The proposed fuel treatments are further described below and outline both the vegetative treatments proposed in these areas and the corresponding follow-up fuel treatments that would accompany and help accomplish the overall goals of the proposed action. A map of the proposed action is also included in this letter.

Strategic Fuel Treatment in Dry Mixed Conifer (5,312 acres)

Vegetation Thinning

Within the dry mixed conifer areas that were identified as needed for strategic fuel treatment in the Strategic Fuel Treatment Placement Plan, the desired densities range from 40-100 ft² basal area. The desired basal area would be accomplished throughout the stand, providing for opportunities to have VDT across the stand, achieving multiple resource goals across the project area. The overall desire for these treatments would be to move the stands towards a properly functioning late-successional system, with fire as the primary disturbance with a more historically characteristic outcome.

Within younger plantations, sapling areas would be thinned to approximately 40 to 150 trees per acre, depending on site conditions, to promote and develop more resilient stand conditions and meet the purpose and need of the planning area.

Fuel Treatments

The goal for the area is to reduce the fuel loadings and modify the fuel profiles of the planning area to more historical conditions. Treatment of any residual surface fuel left over from timber harvest would be machine piled and burned. Underburning could also be used to treat any residual fuel left on harvested units, as well as introducing fire back into the fire adapted ecosystems to restart fire as a primary disturbance mechanism of the functioning stands. Surface fuel would be reduced to approximately 10-15 tons per acre in the dry plant communities of the planning area.

In some instances a combination of treatments would occur in the same area. It is likely that an area would need to have an initial thinning to reduce the horizontal and vertical fuel prior to safely and effectively applying a suite of prescribed fire techniques.

Mechanical fuel treatments could include, but would not be limited to, pile burning, underburning, jackpot burning, lop and scattering (where fuel loading was below the 10 tons per acre), mechanical piling, masticating, or biomass collection. Biomass collection would include machine piling and removal of materials.

Forest Health Treatments in Dry Mixed Conifer (1,664 acres)

Vegetation Thinning

Forest health treatments for sapling/commercial thinning and fuel reduction activities would be similar to the strategic fuel treatment areas. However, in these areas the desired densities range from 60-120 ft² basal area, higher average canopy cover, more frequent areas with little to no treatment, and treatments to meet other resource concerns.

Fuel Treatments

Fuel treatments would still occur in these stands to help forest vegetation remain resilient to uncharacteristic insect, disease and wildfire outbreaks. The treatments would be similar to the

strategic fuel treatments in dry mixed conifer, but would allow for higher average densities of surface fuel while still being within the desired future condition.

Strategic Fuel Treatment in Moist Mixed Conifer (4,063 acres)

Vegetation Thinning

Within moist mixed conifer areas that were identified as needed for strategic fuel treatment in the Strategic Fuel Treatment Plan, the desired densities would range from 80-150 ft² basal area. The desired basal area would be accomplished throughout the stand, providing for opportunities to have VDT across the stand, thereby achieving goals throughout the project area. The overall desire for these treatments would be to move the stands towards a properly functioning late-successional system that would be more resilient to large scale disturbance.

Within younger plantations, sapling areas would be thinned to approximately 50-200 trees per acre, depending on site conditions, to promote and develop more resilient stand conditions and meet the purpose and need of the planning area.

Fuel Treatments

The goal for the area is to reduce the fuel loadings and modify the fuel profiles of the planning area. Treatment of any residual surface fuel left over from timber harvest would be machine piled and burned. Jackpot burning could also be used to treat any residual fuel left on harvested units. Surface fuel would be reduced to approximately 20-25 tons per acre in the moist plant communities of the planning.

Similar to the dry mixed conifer fuel treatments, in some instances a combination of treatments would occur in the same area. It is likely that an area would need to have an initial vegetation treatment to reduce the horizontal and vertical fuel prior to safely and effectively applying a suite of prescribed fire techniques.

Mechanical fuel treatments could include, but would not be limited to, pile burning, jackpot burning, lop and scattering, mechanical piling, masticating, or biomass collection. Biomass collection would include machine piling and removal of materials.

Forest Health Treatments in Moist Mixed Conifer (2,233 acres)

Vegetation Thinning

There is an opportunity to create a more heterogenic landscape with more age, species, and structural diversity to meet multiple resource objectives. These areas are not meant to have fire reintroduced, but to move or maintain stands that would be more resilient to natural, larger scale disturbances.

Within moist mixed conifer areas, the desired densities range from 100-200 ft² basal area. The desired basal area would be accomplished throughout the stand, providing for opportunities to have VDT across the stand, thereby achieving goals across the project area. The overall desire

for these treatments would be to move the stands towards a properly functioning latesuccessional that would be more resilient to large scale disturbance.

Sapling thinning would occur on approximately 200 to 300 trees per acre to promote and develop more resilient stands conditions.

Fuel Treatments

Fuel treatments would be similar to those in the strategic fuel treatment areas, but would allow for higher average densities of surface fuel to remain, averaging 25-30 tons per acre.

Opportunity for Public Comment

Public participation is an important part of this analysis. The Mt. Hood National Forest is seeking information, comments, and assistance from Federal, State and local agencies, Tribes, and other individuals or organizations that may be interested in or affected by the proposed action. We are interested in hearing your comments on these or any other issues you may have on this project. Your issues will be important to us as we develop any alternatives to the proposal, analyze the effects of the alternatives, and select a final course of action. Additionally, written comments received during this scoping period would allow an individual or organization to be eligible to file an objection during the pre-decisional, administrative review process (36 CFR 218).

Comments would be most useful, if received by April 1, 2017. Hand written comments can be mailed or delivered to:

Casey Gatz, Team Leader Barlow Ranger District Mt. Hood National Forest 780 NE Court Street Dufur, OR 97021

The office hours for the Barlow Ranger District are 8:30-4:30, Monday through Friday, excluding legal holidays. Comments can also be submitted electronically to <u>comments-pacificnorthwest-mthood-barlow@fs.fed.us</u> in a format such as an e-mail message, plain text (.txt), rich text format (.rtf), or Word (.doc). Faxed comments should be made to: Casey Gatz, Attn: Crystal Clear Restoration to 541-467-5114.

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record for this project, available for public inspection, and released if requested under the Freedom of Information Act.

Timeline

After comments are received during this scoping period and are incorporated into the analysis, a draft Environmental Analysis will be shared with the public for a 30-day comment period. Upon consideration of comments received on the draft Environmental Assessment, a final

Crystal Clear Restoration

Environmental Assessment and draft Decision Notice will be provided for an objection period in the summer of 2017.

We look forward to your participation in this project.

Sincerely,

Walter P. Hulf

LISA A. NORTHROP Forest Supervisor



