USDA United States Department of Agriculture | Forest Service | Mt. Hood National Forest | Hood River Ranger District
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File Code: 1950
Date: February 13, 2015

Dear Interested Party,

The Hood River Ranger District on the Mt. Hood National Forest has identified you as an individual, agency, or organization that might be interested in commenting on our Polallie Cooper Hazardous Fuels Reduction Project proposal to reduce the fire hazard in order to protect life, and property and to restore forest conditions that are more resilient to wildfire (see Attachment 1). Several segments of private land are located immediately adjacent to the border of this planning area. The Cooper Spur Wildland Urban Interface (WUI) area is listed as a high risk and priority for treatment within the Hood River Community Wildfire Protection Plan (CWPP).

The Polallie Cooper planning area is identified as federal lands that have been substantially altered from their historical range at patch and landscape scales in the Hood River CWPP. Fire progressing to or from this area can have deleterious effects upon two major watersheds, Crystal Springs Watershed Special Management Unit and City of the Dalles Municipal Watershed on the Barlow Ranger District. The planning area includes approximately 7,300 acres in Township 01S Range 09E/10E and Township 02S Range 09E/10E, please see the attached maps.

Background

Over the past several decades, the combination of fire exclusion, several large scale disturbance events, endemic insect mortality and logging activities has resulted in the current vegetative and fuel conditions in the project area. These conditions include higher stand densities, increased vertical and horizontal fuel continuity, changed species composition, and an altered fire regime.

Due to ladder fuels, timber stands in the Polallie Cooper Planning Area east of Highway 35 are susceptible to stand-replacing wildfires. Timber growth, yield, and health west of Highway 35 are currently declining in many of the Douglas-fir/grand fir stands. Fuel concentrations, on both National Forest System (NFS) and private lands within the "urban interface" are moderately high in many areas and could cause potential resource loss and damage to dwellings and other private property if a wildfire should occur. Additionally the Cooper Spur Road, which bisects the western part of the planning area, is a popular travel recreation route.

The CWPP describes this area as a potential project to support wildfire reduction hazards by reducing fuels in and around the WUI. The project area has moderate slopes on the northeast side of Mount Hood and is in the East Fork Hood River watershed with both surface and ladder fuels creating a fire-conducive landscape. There has been a history of large wildfires with a moderate frequency of occurrence.

Private lands within and adjacent to the project area contain a mix of residential homes, outbuildings, forestlands, and agricultural lands. Private landowners have expressed concern that the adjacent NFS lands be managed so that wildfire suppression can be effective and successful.

Fire regimes are a national classification of the historic combined conditions for fire severity and frequency for a particular environment. Fire Regime 3 is characterized by 25-100+ year frequency and mixed severity, and is the fire regime of the majority of the project area.

Purpose and Need

The overall purpose of this proposal is to reduce the fire hazard in order to protect life and property and to restore forest to conditions that are more resilient to wildfire on National Forest System (NFS) lands. This planning area is the last untreated wildland urban interface (WUI) on the eastside of the Mt. Hood National Forest.

In order to meet these purposes, the underlying needs for this project are to:

- Reduce or maintain levels of hazardous fuels, including surface, ladder, and crown fuels to reduce the risk of unwanted effects of wildfire on NFS lands and adjacent privately owned land;
- Create defensible space in the communities throughout the WUI to meet the objectives and goals of the CWPP;
- Move the landscape toward more historic conditions to reduce fuel loading and restore forest resiliency;
- Reduce the risk of large stand replacing events using management strategies such as thinning overstory and understory trees (thinning from below), prescribed burning, piling and burning, masticating of underbrush, reducing down woody fuels, and swamper burning; and,
- Move tree species composition to a higher proportion of fire tolerant ponderosa pine, western larch and Douglas-fir.

Land Use Allocations

The desired future condition of the project is to develop an open multi-story (uneven-aged) stand with canopy closure that would allow fire behavior to be predominately surface fire, and to have fire resilient stand species. Achieving this desired future condition would meet the overall goals of the land allocations within the project area.

Several land allocations for NFS lands as designated by the Mt. Hood National Forest Land and Resource Management Plan (Forest Plan), as amended by the Northwest Forest Plan, are found within the project area. The four primary Forest Plan land allocations in the planning area are Scenic Viewshed (B2), Winter Recreation Area (A11), Deer and Elk Winter Range (B10), and Wood Product Emphasis (C1). Land in A4-Special Interest Area is located within the planning area, but does not have any actions proposed within it. B10-Deer and Elk Winter Range has less than 1% of the Proposed Action within this management area. A secondary land use allocation in the planning area, Pileated Woodpecker/Pine Marten Habitat Area (B5), occurs on approximately 8% of the acres proposed for treatment. Where applicable, the more stringent standards and guidelines would be applied where land use allocations overlap.

The majority of the project area (approximately 58% of the planning area, and 83% of acres proposed for treatment) is within B2-Scenic Viewshed land use allocation, as described by the Forest Plan (pages 4-218 thru 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. The major characteristics are for the visual character of the landscape resulting from prescribed visual quality objectives within distance zones from selected viewer positions. For this project, Highway 35 serves as the main viewer position. Within the main corridor of Highway 35, vegetation should be comprised of primarily multi-age, multi-species stands with a diverse understory of natural plant associations. The foreground should contain numerous large diameter trees with small, natural appearing openings.

C1-Timber Emphasis land use allocation is approximately 8% of the planning area and 15% of the acres proposed for treatment. 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 (pages 4-289 thru 4-290).

Management area A11-Winter Recreation Area (pages 4-190 thru 4-191) encompasses approximately 18% of the planning area and 2% of the acres proposed for treatment. The goal of this area is to provide high quality winter recreation opportunities including: downhill skiing, Nordic skiing, snowmobiling, and snowplay within a natural appearing forest environment.

The Northwest Forest Plan land use allocations overlap allocations within the Forest Plan. This planning area includes Riparian Reserve, Late-Successional Reserve, Administratively Withdrawn and Matrix. Treatments would be located in Matrix, Late-Successional Reserve and Riparian Reserve areas, but not within Administratively Withdrawn areas. Riparian Reserve includes areas along rivers, streams, wetlands, ponds, lakes, and unstable or potentially unstable areas where the conservation of aquatic and riparian-dependent terrestrial resources receives primary emphasis. Late-Successional Reserves, in combination with other allocations and standards and guidelines, are to maintain a functional, interactive, late-successional and old-growth forest ecosystem. 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).

Portions of the Crystal Springs Watershed Special Resource Management Unit are located within the Polallie Cooper planning area. This management unit will be established on completion of the Cooper Spur-Government Camp land exchange. While this land exchange has not yet occurred, the agency will comply with the management unit goals in the interim. The goals of this management unit are to ensure the protection of the quality and quantity of the Crystal Springs watershed as a clean drinking water source for the residents of Hood River County, Oregon; and to allow visitors to enjoy the special scenic, natural, cultural, and wildlife values of the Crystal Springs watershed. To protect these resources, the Forest Service can conduct fuel reduction and forest health management treatments to maintain and restore fire-resilient forest structures containing late successional forest structure characterized by large trees and multistoried canopies, as ecologically appropriate.

Proposed Action

The Hood River Ranger District is proposing a suite of activities to treat approximately 2,960 acres of the planning area, or approximately 40% of the landbase. The mechanical fuels reduction treatment methods would consist of tree thinning including the sale of vegetative material, machine piling of woody material, hand thinning, and a suite of noncommercial fuel reduction treatments. Underburning would be used in combination with mechanical treatments or with limited non-mechanized (hand falling) treatments to restore stand health and to create conditions where fire could function in a more natural role.

The proposed treatments for the planning area are outlined below. All proposed treatment areas are shown on the Proposed Action map, and include riparian buffers and buffers around known Northern spotted owl nesting sites. This project would maintain all suitable Northern spotted owl habitat located within treatment units. Project design would follow Forest Plan guidelines to preserve the visual integrity of Highway 35 Scenic Byway and important recreation values along trails within the project boundary. A copy of the Proposed Action map is attached; however a higher resolution copy of the Proposed Action map is available on-line at: http://www.fs.usda.gov/goto/mthood/projects.

Vegetation Treatments

Vegetation treatments are proposed on approximately 2,960 acres with the goal being variable density thinning (VDT) across the project area. These stands would be treated according to the existing condition on the ground. Three main treatment types have been developed; recently unmanaged stand thinning, plantation thinning and sapling thinning (see Table 1). Within these three main treatment types, multiple densities have been identified to meet the goals for fuel reduction and restoring resilient stands.

Within moist mixed conifer sites, desired densities range from 80-150 basal area. Within dry mixed conifer sites, the desired densities range from 80-190 basal area. The desired basal area would be accomplished throughout the stand, providing for opportunities to have VDT across the stand, achieving goals across the project area (see Table 2).

All thinning activities proposed in this project would apply VDT, which allows flexible local density levels to achieve overall treatment objectives. This allows emphasis to be placed on leaving vigorous trees of all sizes without concern for spacing. Additionally, fuels treatments in harvested stands would be applied when all thinning treatments have been completed. This is expected to be within five years of mechanized treatments. Post-activity assessments would be completed to determine specifically when and where prescribed fire would be applied.

Table 1. Proposed Action for the Polallie Cooper Planning Area

Proposed Action	Acres
Recently Unmanaged Stand Thinning	1,900
Plantation Thinning	440
Sapling Thinning	620
Total	**2,960**

Table 2. Existing and Desired Future Conditions for the Polallie Cooper Proposed Action

Proposed Action	Acres	Existing Basal Area	Desired Average Basal Area	Existing Canopy Cover	Desired Average Canopy Cover	Existing Trees Per Acre	Desired Average Trees Per Acre
Recently Unmanaged Stand Thinning	1,900	120-280	80-190	45-75	30-50	380-2750	NA
Plantation Thinning	440	120-280	80-190	45-80	30-40	450-2750	NA
Sapling Thinning	620	NA	NA	60-68	50	590-2750	150-250 in MMC* / 80-150 in DMC*

*Recently Unmanaged Stand Thinning and Plantation Thinning units would use basal area and canopy cover to determine desired outcome. Sapling Thinning stands do not have sufficient structure to calculate basal area and would utilize trees per acre to establish desired condition.
*MMC = Moist Mixed Conifer stands
*DMC = Dry Mixed Conifer stands

Recently Unmanaged Stand Thinning

These stands have had past vegetation manipulation, but are no longer within an actively managed plantation. These stands may have missed a fire cycle or other disturbance event and have a reduced resiliency to disturbance events in the future. Fuels reduction thinning treatments include prescriptions to thin conifer trees predominately grand fir and Douglas-fir dominated stands to an average canopy closure of 35 to 60 percent on 1,900 acres. Treatments would promote and develop more resilience to large scale disturbance events and provide defensible space around WUI.

Plantation Thinning

Plantation fuels reduction thinning on 440 acres to an average canopy closure of 40 percent in both moist and dry forest types to promote and develop more resilient stand conditions to large scale disturbance events and provide defensible space around WUI.

Sapling Thinning

Sapling fuels reduction thinning with mechanical treatment on 620 acres to approximately 60 to 200 trees per acre in both moist and dry forest to promote and develop more resilience stand conditions to large scale disturbance events and provide defensible space around WUI.

Fuel Treatments

A variety of fuel treatment methods would be used throughout the approximately 2,960 acres within the planning area. Mechanical fuels reduction treatment is a non-commercial thinning and mechanical brush treatment to promote and develop more resilient stand conditions. 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. Underburning could also be used to treat any residual fuel left on harvested units. Surface fuels would be reduced from approximately 25-55 tons per acres to 15 tons per acre on the dry plant communities of the planning area and from 45-60 tons per acre to 25 tons per acre in the moist plant communities within the planning area.

Pile Burning

These treatments include piling of understory brush, small trees, and down dead woody material by hand crews or mechanical equipment into piles of woody debris that may be later burned or utilized as biomass. Chainsaws and hand tools would be used to cut the material to aid in the piling operation. Landing piles would be larger than hand piles and contain the woody material (limbs, needles, bark and portions of the trunk) removed from trees during the harvesting procedure. This reduces fuel concentrations from both natural accumulation and the excess material from harvest activities.

Jackpot Burning

Jackpot burning involves igniting concentrations of fuels on the forest floor, whether they are natural fuels or fuels resulting from a silvicultural cutting treatment. This differs from piling and burning because the fuels burned in jackpot burning were not collected and placed into piles. However, in areas where jackpot burning would occur there are sufficient concentrations of fuel to accomplish fuel reduction objectives with the existing and created fuels.

Mowing/Mastication

This treatment consists of mowing the understory of brush, small trees, and other vegetation. A mowing attachment is towed behind a dozer or tractor, or attached to the head of an excavator. The vegetation is chopped into small pieces and left on the surface.

Underburning

Underburning is the use of prescribed fire underneath existing or residual trees to treat natural and /or created fuels such as, dead woody material, needle litter and dead brush.

Swamper Burning

Swamper burning typically occurs in the rain and can work well when there are a few inches of snow on the ground. These conditions help control fire spread and allow for fuel reduction treatment in areas that, because of slope or other conditions, do not allow for traditional piling and burning of accumulated fuels. This provides a flexible method for reducing down fuels while using the weather to reduce spread risk.

Combined 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 fuels prior to safely and effectively applying a suite of prescribed fire techniques. An example would be a unit that is first treated with a vegetation treatment, and the slash materials are piled. Burning of the piles may occur the following year, and would then be followed by a series of underburning several years after the initial treatment.

Road Treatments

Temporary roads are being proposed. 12 miles of temporary roads would be utilized as part of the Proposed Action. Approximately 4 miles of these roads would be on existing road beds, and 8 miles would be new temporary roads. Log haul would occur on approximately 28 miles of NFS roads, maintenance and repair activities are anticipated for the majority of these roads.

Mt. Hood Land and Resource Management Plan

Standards and guidelines in the Mt. Hood Forest Plan were not written to specifically address hazardous fuels reduction. When the Mt. Hood Forest Plan was written (1990), it emphasized traditional timber sales, and did not specifically address fuels reduction projects. It is anticipated that the following standards would not be fully met with this project based on an initial effects analysis conducted by the interdisciplinary team.

- Organic Matter (FW-033): At least 15 tons per acre of dead and down woody material in eastside vegetation communities…should be maintained and evenly distributed across managed sites.

- Snags (FW-215): Where new timber harvest units occur, wildlife trees (i.e. snags and green reserve trees) should be maintained in sufficient quantity and quality to support over time at least 60 percent of the maximum biological potential of primary cavity nesting species.

- Silvicultural Systems (FW-333): Uneven-age management should not be applied on slopes where cable logging systems would be necessary (30+% slopes).

Exceptions to the Forest Plan standards are allowed under the Forest Plan, if they are identified during the interdisciplinary process. The exceptions were identified during the interdisciplinary planning analysis and the IDT process concluded that these exceptions were within the purpose and need for action. Forest Plan page 4-45 states that for "should" standards "action is required; however, case-by-case exceptions are acceptable if identified during interdisciplinary project planning, environmental analyses. Exceptions are to be documented in environmental analysis (National Environmental Policy Act 1969) public documents."

Healthy Forest Restoration Act

The District is analyzing the proposed fuels reduction project in an Environmental Assessment (EA) under the authorities of the Healthy Forest Restoration Act (HFRA). The Healthy Forests Restoration Act was signed into law on December 3, 2003 with one of the purposes to improve the capacity on Federal lands to plan and conduct hazardous fuels reduction projects aimed at protecting communities, watersheds, and certain other at-risk lands from wildfire.

The Polallie Cooper project qualifies under Title 1 - Hazardous Fuel Reduction on Federal Land of the HFRA. It is authorized as described in Section 102 of the HFRA because it is within a wildland urban interface area on federal land identified in a community wildfire protection plan.

HFRA authorized fuel projects must be designed to retain or culture old-growth forest structure and large trees according to provisions in the law. Additionally, authorized projects must be conducted consistent with all current laws or policies governing forest management in the area. HFRA authorized projects require collaborative planning, monitoring and assessing forest and rangeland health, and the Act contains provisions that streamline the environmental review of a project.

The Hood River Stewardship Crew has been collaborating with the interdisciplinary team on this planning area since 2012, which meets the requirements and intent of HFRA. Through a series of field trips as well as office meetings, the group developed a set of recommendations for the Polallie Cooper planning area. In August 2014 the Hood River Collaborative Group developed recommendations for the planning area, which have been reviewed in the development of the Proposed Action.

The recommended treatments are designed to meet the objectives of reducing hazardous fuels, creating defensible space in the communities around federal land and increase forest resiliency. Those recommendations are available on the project website: http://www.fs.usda.gov/goto/mthood/projects.

The collaborative group is composed of representatives from: federal and state agencies, watershed councils and local agencies, environmental groups, non-governmental organizations, timber industry, private citizens, and neighboring landowners. The collaborative group recommended developing fuels treatments that would restore forest stand health and allow for fire to play a more natural role. After receiving the recommendations, District personnel began the interdisciplinary process of developing a detailed fuels reduction and restoration proposal that would meet the objectives for the area and respond to many of the recommendations of the collaborative group, as described in the previous sections.

Opportunity for Public Comment

Public participation is an important part of this analysis. The District 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.

In addition, written comments must be received during this comment period to be eligible to file an objection during the pre-decisional, administrative review process (36 CFR 218). Comments must be specific and may pertain to the nature and scope of the environmental, social, and economic issues, or possible alternatives to the Proposed Action.

Comments will help the Forest Service refine the Proposed Action and develop mitigation measures. Comments would be most useful, if received by March 16, 2015. Office hours are 8:30-4:30, Monday through Friday, excluding legal holidays. Hand written comments can be submitted to:

Casey Gatz
Hood River Ranger District
6780 Highway 35
Mt. Hood/Parkdale, OR 97041

Electronic comments should be submitted to comments-pacificnorthwest-mthood-hoodriver@fs.fed.us 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: Polallie Cooper to 541-352-7365. 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 comment period and are incorporated into the analysis, an EA will be completed and the objection period is expected to begin in the fall of 2015.

We look forward to your participation in this project.

Sincerely,

Janeen Tervo

JANEEN TERVO
District Ranger
Hood River Ranger District

Attachments:
Figure 1: Planning Area Map
Figure 2: Proposed Action Map