Basic Project Information

Type of project – The Grasshopper project proposes to treat approximately 5,658 acres of dry and moist mixed conifer stands, in plantations and non-plantations of varying ages and past treatment activities. The treatment proposed in the Inventoried Roadless Areas (IRAs) would be in five separate locations, totaling approximately 272 acres. Two silvicultural methods would be used:

- Intermediate thinning of small diameter trees (less than 10” DBH) in plantations under 40 years of age; and
- Variable density thinning (VDT) from below of small diameter trees (less than 14” DBH) outside of plantations, in previously thinned stands or uneven-aged stands.

Purpose and need – The overall purpose for the Grasshopper project is to improve the health and vigor of forested stands. There is a need to reduce risks associated with high-intensity wildfires, to protect and enhance wildlife habitat, and to contribute to a sustainable supply of timber and other forest products that will help maintain the stability of local and regional economies. In order to meet this overall purpose, the project aims to:

- Enhance and restore forest diversity, structure, and species composition including pine/oak habitat and riparian reserves;
- Maintain a road network that provides for public and firefighter safety in the event of a wildfire;
- Enhance, restore, and protect wildlife habitat; and
- Provide forest products in alignment with the Forest Plan, as amended by the Northwest Forest Plan.

Current stage of project development and anticipated timeline – The scoping period ended on August 15, 2019. The comment period will be initiated in May 2020.

Roadless Policy Information

Decision authority: Following the Chief’s October 2018 direction, the Regional Forester has been delegated the authority to approve exceptions in roadless areas consistent with the 2001 roadless rule.

For road construction or reconstruction: No road construction or reconstruction is proposed within the IRAs.

For timber cutting, sale, or removal:
- Total acres to be treated/IRA acres to be treated: 5,658/272
- Commercial timber sale? Stewardship contract? No commercial products removed? Commercial products would be removed and non-commercial products would be treated through stewardship contracts.
- Purpose for tree cutting: The proposed treatments would be to maintain and restore the characteristics of ecosystem composition and structure to reduce the risk of an uncharacteristic wildfire by moving the stands towards the natural fire return interval.
• **Description or characterization of trees to be cut:** There are two types of treatments proposed within the IRAs:
  - Intermediate thinning of small diameter trees (less than 10” DBH) in plantations under 40 years of age for a total of approximately 38 acres. An estimated 150-200 trees per acre would remain in the plantation, favoring a natural diversity of species composition and structure that would be consistent with natural disturbance patterns.
  - VDT from below of small diameter trees (less than 14” DBH) in previously thinned stands or uneven-aged stands for a total of approximately 234 acres. Past management activities and practices in both previously thinned and untreated stands have altered the stand density and limited their capacity to move towards historic conditions leaving the stands vulnerable to uncharacteristic events. VDT would maintain a basal area range of 80-120 square feet in a variety of age ranges. Quadratic mean diameters of the stands would increase after treatment. VDT and the use of skips and gaps would allow for flexible local density levels to achieve overall treatment objectives and resource protection, while also leaving the most vigorous trees over 14” DBH.

• **What alternatives not requiring tree cutting in IRA were evaluated? Why were they not feasible?** Two other alternatives were evaluated:
  - An alternative was considered that would not treat stands within the IRAs. This alternative was not considered further because it would leave the IRAs at a high risk for large-scale uncharacteristic wildfire.
  - Underburning without thinning or brushing existing vegetation was also considered, but not evaluated further. Underburning without thinning could result in uncharacteristic fire behavior, which could result in large-scale mortality and damage to residual stands. Also, prescribed fire implementation would be complex and cost prohibitive. Without thinning, a prescribed fire plan within the IRAs would require extensive development, a large organization of firefighting resources, and substantial site preparation prior to implementation.

• **What Roadless Area Conservation Rule (RACR) §294.13 exception situation applies? Short statement of why. In response to the “Dueling Injunctions” issue:** 294.13(b)(1)(i): To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period.

• **Why is the project consistent with the RACR?** The project is consistent with RACR because the purpose and need includes improving the health and vigor of forested stands and reducing risks associated with uncharacteristic wildfires.

**Why here? Why now?**

**Explain why the purpose and need cannot be met without these activities occurring in IRA.**

**Alternative project locations? Alternative cutting unit locations? Alternative access?**

A need was identified to maintain or restore the characteristics of the ecosystem composition and structure within the IRAs of the Grasshopper planning area. Each of the five IRAs have some level of variance from their natural disturbance regime. These departures can be attributed to wildfire suppression or past harvest activities.

In the eastern part of the Grasshopper planning area, including three IRAs, there is a risk of uncharacteristic wildfires due to prior fire seclusion. Historically, these areas would burn frequently, with
low severity wildfires being the main disturbance mechanism. In its current condition, this part of the planning area could support high severity, stand replacing wildfires. Leaving these IRAs untreated has the potential to create unsafe engagement areas for firefighters in the event of a wildfire. The Badger Creek Wilderness is along the north boundary of the planning area, creating no alternative cutting locations that would meet the purpose and need of the project.

Current conditions in the two additional IRAs, located in the western part of the Grasshopper planning area, have been influenced by past harvest activities. These past harvest activities have created uncharacteristically dense growing conditions and a lack of diversity. These conditions altered species and structural diversity, resulting in these areas to be comprised of primarily single aged Douglas fir. Proposed treatments would be designed to facilitate the restoration of diversity, structure and species composition that would be expected to occur under normal disturbance regimes. These activities would be in alignment with other proposed treatments in the western part of the planning area to meet the purpose and need of restoring forest diversity.

**Explain why imperative to do the project now. Loss of resource values? Health and safety? Other?**
The majority of proposed areas for treatment in the Grasshopper planning area have been mapped as Condition Class 2 or 3, indicating they have missed one or more natural fire events and now contain unnaturally high fuel situations. Also, the communities included in the Pine Hollow Wildland Urban Interface, such as Wamic, Pine Hollow, and Sportsman’s Park, are within the vicinity of federal lands that are at high risk from wildfire. Treating within these IRAs would help support the purpose and need of the project by helping to protect for public and firefighter safety while also moving the stands toward the natural fire return interval. Treatments would also support other aspects of the purpose and need including protection of wildlife habitat and forest products.

**Other Key Information**

**External collaboration: characterize nature (pattern and intensity) of public support or public controversy.**
Public support for treatments within the IRAs is mixed. Some members of the Wasco County Forest Collaborative, which includes local landowners, support management activities that allow for wildfire suppression to be effective. However, some members of this collaborative group, such as Bark, are generally unsupportive of treatment within IRAs; however, group recommendations stated that some treatments may be supported if there is an ecological case for management.

**Have public comments or input specifically mentioned roadless area issues?**
There were several comments received during the scoping period (July 15 – August 15, 2019) that discussed treatments in IRA. Most of these comments did not support treating in IRA, and these mostly came from Bark and Oregon Wild. AFRC stated that they support treating in IRA.

**What is the likelihood of appeal or objection? Litigation?** Bark and/or Oregon Wild are likely to object to this project.

**For More Information Contact:**
Whitney Olsker, Silviculturist – East Zone, Mt. Hood National Forest
whitney.olsker@usda.gov
Rick Lancaster, Fuels Specialist, East Zone, Mt. Hood National Forest
richard.lancaster@usda.gov
Ashley Popham, NEPA Planner, East Zone, Mt. Hood National Forest
ashley.popham@usda.gov