United States Department of Agriculture
Forest Service
Mt. Hood National Forest
Barlow Ranger District
780 NE Court St
Dufur, OR 97021
541-467-2291
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File Code: 1950

Date: July 15, 2019

Dear Interested Party:

The Barlow 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 Grasshopper restoration project proposal to improve the health and vigor of forested stands, reduce risks associated with high-intensity wildfires, protect and enhance wildlife habitat, and contribute to a sustainable supply of timber and other forest products that will help maintain the stability of local and regional economies.

The Grasshopper planning area is bordered to the north by the Badger Creek Wilderness, to the west by NFS Road 4880, and to south by the Rocky planning area - which runs roughly along the Hood River and Wasco County line. The planning area tapers east to the Bonney Crossing campground vicinity.

The planning area includes approximately 5,658 acres located within:

- Township 03N Range 10E Sections 1, 2, 3, 4, 9,10;
- Township 03N Range 11E Section 30, 31, 32, 33, 34;
- Township 04N Range 10E Section 25, 26, 27, 28, 33, 34, 35, 36;
- Township 04N Range 11E Section 2, 3, 4, 5, 38.

Background

The eastside of the Mt. Hood National Forest falls within the Eastern Oregon Cascades. Plant communities transition from dry ponderosa pine/oak in lower elevations to moist mixed conifer at higher elevations from east to west across the planning area. The Forest Ecosystem Management Assessment Team (FEMAT) report recognizes that conditions in the Eastern Oregon Cascades Province differ from western provinces as fire has played a significant role in shaping the forest in the past.

Over the past 100 years, fire suppression efforts and favorable climatic conditions have altered vegetation growth, accumulation of dead fuels, stand composition, and structure. Past management activities have created highly dense, closed-canopy stand conditions throughout much of the planning area. High stand density has contributed to mortality of trees because of competition for nutrients, water and sunlight. In dry mixed conifer stands, high density has slowed the development of new age classes and structural variety that would have occurred with natural disturbance in the past. In dry and moist mixed conifer areas, densely stocked stands are creating continuous ladder fuels.

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. The communities of Wamic, Pine Hollow, and Sportsman’s Park are east of the planning area and are included in the Pine Hollow Wildland Urban Interface (WUI). The Federal Register identifies these as communities within the vicinity of federal lands that are at high risk from wildfire. Landowners have expressed concern that adjacent National Forest System lands be managed so that wildfire suppression can be effective.

Purpose and Need

The overall purpose for the Grasshopper project is to conduct activities within the planning area 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, this 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 and Northwest Forest Plans.

Proposed Action

Proposed treatment types would occur in either dry or moist mixed conifer. Treatments would occur in a variety of stand conditions in both plantations and non-plantations of varying ages and past treatment activities. Within these treatment types, multiple densities have been identified to meet the goals for fuel reduction and restoring resilient stands and would be treated according to the existing condition on the ground.

Silvicultural Thinning Treatments

Thinning treatment activities proposed in this project would apply two silvicultural practices: variable density thinning (VDT) from below and intermediate thinning. Approximate acreage proposed for treatment is shown in Table 1.

Table 1. Proposed Action Activities

Treatment Activity	Approximate Acres
Variable Density Thinning (VDT) from Below	3903
Intermediate Sapling Thinning in Plantations < 40 years of age	1398
Intermediate Commercial Thinning in Plantations 40-80 years of age	357
Total Acres	**5658**

Variable Density Thinning from Below

Variable density thinning from below (VDT) would be applied where existing conditions are in an uneven-aged stand type. "Uneven-aged" refers to stands having three or more age classes of trees and where there are at least three cohorts. This would allow for flexible local density levels to achieve overall treatment objectives and resource protection, and emphasizes leaving the most vigorous trees of all sizes without concern for spacing. VDT from below would take place in stands with recent harvest activity (after 1990) and stands with minimal to no past harvest activities. Skips and gaps would be utilized to create density and structural diversity. Gap size would be limited to no more than 2 acres.

Intermediate Thinning

Intermediate thinning would be applied where existing conditions are in an even-aged or two-aged stand type. "Even-aged" refers to stands where all the trees are the same age. "Two-aged" refers to stands where there are two distinct age classes of trees. Intermediate thinning would only occur in plantations.

Skips and gaps would be utilized to create density and structural diversity. Gap size would be limited to no more than 5 acres.

Land Use Allocations

Silvicultural thinning activities are proposed for units in land use allocations (LUAs) as described in the Mt. Hood National Forest Land and Resource Management Plan (Forest Plan) and Northwest Forest Plan (NWP). Thinning activities are also proposed for areas within the Mt. Hood National Recreation Area (NRA) and Region 6 Inventoried Roadless Areas. Because LUAs overlap, total acres are not listed. Approximate numbers of acres proposed for treatment for each LUA are shown in Tables 2 and 3.

Table 2. Mt. Hood National Forest Land Use Allocations

Land Use Allocation	Total LUA acres within planning area	Approximate acres of LUA proposed for treatment	Percent of LUA treated
A5 Unroaded Area	1016	213	21%
A6 Semi Primitive Roaded Recreation	193	125	65%
A9 Key Site Riparian	677	0	0%
B4 Pine-Oak Habitat	180	180	100%
B5 Pileated Woodpecker/Pine Marten Habitat Area	1252	541	43%
C1 Wood Product Emphasis	5788	5096	88%

Table 3. Northwest Forest Plan and other Land Use Allocations

Land Use Allocation	Total LUA acres within planning area	Approximate acres of LUA proposed for treatment	Percent of LUA treated
Matrix	4245	4245	100%
Riparian Reserves	1032	535	52%
Late Successional Reserve (LSR)	2577	786	31%
National Recreation Area (NRA)	2332	543	23%
Inventoried Roadless Area (IRA)	600	272	45%

Exceptions to Mt. Hood Forest Plan standards are allowed under the Forest Plan, if they are identified during the interdisciplinary (IDT) process. Exceptions were identified during the interdisciplinary planning analysis and the IDT process concluded that these exceptions were within the purpose and need for action. Standards in the Forest Plan were not written to specifically address fuels reduction. Also, cover and canopy closure may vary from Forest Plan standards in order to restore pine-oak habitat at a landscape level. In addition, Forest Plan standards related to "biological potential" have been replaced with updated measures in an effort to apply the best available science. Also, because there are a number of plantations in the planning area, several of the subwatersheds it overlaps may currently be at the verge of exceeding the standard disturbance threshold as outlined in the Forest Plan. There is potential for the proposed action to push that threshold to be further exceeded.

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.

Fuels Reduction Treatments

Activities would take place within the footprint of silvicultural treatment areas. Objectives for fuels treatment are to create a landscape with a network of fuel breaks and openings that promote public and firefighter safety in the event of a wildfire. Treatments are designed to reduce surface fuel loadings and reduce the vertical and horizontal continuity of fuels. Surface fuels would be treated to approximately 10-15 tons per acre in dry plant communities and to 20-25 tons per acre in moist plant communities.

Fuel Breaks

Fuel breaks would be established along roads and/or ridges, designed to compartmentalize the landscape into blocks that are representative of a natural disturbance. Fuel breaks would be located in areas to facilitate indirect fire suppression tactics. Treatments would reduce surface fuel loadings, reduce vertical continuity of fuels and increase tree canopy spacing. Fuel break width would be 300' total, adjusted for slope.

Prescribed Burning

Underburning is the use of prescribed fire underneath existing or residual trees to treat natural fuels such as dead woody material, needle litter, and brush. This treatment would occur in stands that can support underburning without thinning activities and stands in which thinning activities have occurred. Underburning is used following pre-treatments such as thinning, masticating, or pile burning to further reduce the surface fuels. The use of underburning helps maintain the desired vegetation conditions and enhance the overall health and resiliency of the stand. Underburning would not occur within moist mixed conifer areas.

Pile burning is the use of prescribed fire to ignite hand or machine piles created by cut vegetation during timber or fuel reduction activities. Activity created and/or natural fuels, would be piled to reduce fuel loadings and burned once fully cured. Pile burning includes the burning of landing piles post timber harvest.

Riparian Area Enhancement and Snag Creation

Activities would enhance aquatic habitat in selected stands within riparian corridors of the Threemile sub-basin. Activities may include directionally falling trees into the stream channel and floodplain to improve large wood densities, planting of hardwood species, removal of conifers, and promoting aspen regeneration. Snag creation activities within uneven-aged stands would be used to move stand structure towards historical conditions.

Road and Recreation Site Closures

Roads may be closed if it is determined that closing the road would enhance, restore, and protect wildlife habitat. No roads would be closed that provide for public and firefighter safety, or that are anticipated for future management. Recreation management activities may include campsite expansion, reduction or closure, with the goal of managing for dispersed recreation opportunities to achieve a balance between quality recreation experience, resource protection and reduced fire risk.

Your Involvement

This letter invites your participation during our public scoping process. Any comments related to the proposed action (as supported by the purpose and need) for this project are welcome during this scoping period. If you have information you feel the Forest Service may not be aware of, or have concerns regarding this proposed action, please provide comments using one of the methods described at the end of this letter.

We anticipate that the level of review necessary for this proposal will be covered through an Environmental Assessment (EA). Public involvement is a key element of the land management planning process. The National Environmental Policy Act (NEPA) provides the framework for public participation in the federal decision making process. Public input at this point in the process will help identify issues associated with the Grasshopper project area as well as inform the development of the proposed action. Comments will again be invited when a Preliminary Assessment is available (anticipated in February 2020). Following that comment period, a final Environmental Assessment would be prepared along with a Draft Decision Notice.

Please submit your comments within 30 days of the date of this letter. Comments can be submitted via mail to:

Ashley Popham, Planner
Barlow Ranger District
780 NE Court Street
Dufur, Oregon 97021

Comments can also be submitted electronically to comments-pacificnorthwest-mthood-barlow@fs.fed.us in a format such as an e-mail message, plain text (.txt), rich text format (.rtf), or Word (.doc).

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.

A copy of this letter and maps will be available on the Mt. Hood National Forest website at https://www.fs.usda.gov/projects/mthood/landmanagement/projects.

We look forward to your participation in this project.

Sincerely,

KAMERON C. SAM
District Ranger
Barlow Ranger District