

Date: January 18, 2022

Dear Interested Party,

The Forest Service is seeking public comment on the South Fivemile Insect and Disease Project, a forest management project designed to reduce the risk of landscape level disturbance and increase forest resiliency to insect and disease. The project is located on the Barlow Ranger District, Mt. Hood National Forest. You are being contacted because you have expressed an interest in projects on the District. Please see the "How to Comment" section of this letter for information on how and when to provide input into this proposal.

Project Location

The South Fivemile Insect and Disease planning area is located in the eastern portion of the Barlow Ranger District. The planning area lies within the Eightmile Watershed, which is a Tier 1 Key Watershed. Upper Eightmile Creek and Fivemile Creek are the primary subwatersheds included within the planning area. It is bordered to the west by Forest Road 4430; to the east by the Mt. Hood National Forest Boundary; to the north by Forest Roads 1720 and 4431; and to the south by the Eightmile drainage.

The planning area is approximately 5,892 acres with approximately 2,997 acres of potential treatment areas located within the following: Township 1 South, Range 10 East, Section 36; Township 2 South, Range 10 East, Sections 1 and 12; Township 1 South, Range 11 East, Sections 23, 24, 25, 26, 27, 31, 32, 33, 34, 35, and 36; and Township 2 South, Range 11 East, Sections 2, 3, 4, 5, 6, 7, 8, 9, 10, and 11.

Mt. Hood National Forest Plan and Northwest Forest Plan

The South Fivemile planning area is comprised of several land use allocations as described in the Forest's Land and Resource Management Plan (Forest Plan) as amended.

Table 1. Mt. Hood National Forest Plan Land Use Allocations in the South Fivemile planning area.

Land Use Allocation	Approximate Acres in Planning Area	Approximate Acres in Potential Treatment Areas
B2 Scenic Viewshed	405	294
B6 Special Emphasis Watershed	5,487	2,703
B5 Pine Marten/Pileated Woodpecker*	1,080	633
Total	5,892	2,997

*B5 is a secondary land use allocation that overlaps with some areas of the B6 (dominant) land use allocation. Therefore it is not calculated in total acreage.

The goal of the B2-Scenic Viewshed land use allocation is to “provide attractive, visually appealing forest scenery with a wide variety of natural appearing landscape features [and] utilize vegetation management activities to create and maintain a long term desired landscape character” (Forest Plan, page 4-218).

The primary goal of the B6-Special Emphasis Watershed land use allocation is to "maintain or improve watershed, riparian, and aquatic habitat conditions and water quality for municipal uses and/or long term fish production." A secondary goal is "to maintain a healthy forest condition through a variety of timber management practices" (Forest Plan, page 4-246). B5-Pileated Woodpecker/Pine Marten habitat Area is a secondary land use allocation in the planning area. The goal of this land use allocation is to “provide Forestwide mature or old growth forest habitat blocks of sufficient quality, quantity and distribution to sustain



viable populations of pileated woodpecker and pine marten.” A secondary goal is to “maintain a healthy forest condition through a variety of timber management practices” (Forest Plan, page 4-240).

The Northwest Forest Plan land use allocations for the planning area are Matrix, Riparian Reserves, and Late Successional Reserves (LSR). Most treatments would be proposed within Matrix areas and some may occur within riparian areas. No treatment is proposed in LSR.

Table 2. Northwest Forest Plan Land Use Allocations acres in the South Fivemile I&D planning area.

Land Use Allocation	Approximate Acres in Planning Area	Approximate Acres in Potential Treatment Areas
Riparian Reserves	845	195
Matrix	4,679	2,802
Late Successional Reserve (LSR)	368	0
Total	5,892	2,997

Riparian reserves "provide an area along all streams, wetlands, ponds, lakes, and unstable or potentially unstable areas where riparian-dependent resources receive primary emphasis." Matrix lands "consist of those federal lands outside the six categories of designated areas" under the Northwest Forest Plan (Record of Decision and Standards and Guidelines, page A-5).

Background

The Mt. Hood National Forest has experienced widespread tree mortality in the recent past. Given the projections of increasing temperatures and drier summers, forest conditions are at a higher risk for mortality as the period of summer water deficit lengthens and becomes more severe. Additionally, these conditions have caused landscape-scale areas on the forest to be at high risk of insect and disease epidemics.

As such, additional landscape-scale areas were designated on Mt. Hood National Forest to address insect and disease threats under Section 602 of the Healthy Forest Restoration Act of 2003 (16 U.S.C. 6591a), as added by Section 8204 of the Agricultural Act of 2014. These landscape -scale areas are experiencing decline in forest health based on annual forest health surveys and are at risk of substantial tree mortality over the next 15 years based on the National Insect and Disease Risk map.

A total of 580,048 acres were designated on Mt. Hood National Forest by the Forest Service Chief on April 16, 2019. These designated areas exclude Wilderness, Wilderness Study Areas, and non-Forest Service inholdings. The request letter, designating letter, and corresponding map can be found at: <https://www.fs.usda.gov/managing-land/farm-bill/area-designations>.

Since the South Fivemile project is located within this designated area, the project may be considered under Section 603 of the Healthy Forest Restoration Act. For a project to be considered under Section 603, commonly known as an “Insect and Disease categorical exclusion (CE)”, it must meet the following requirements:

- The project is limited to areas in the wildland urban interface (WUI) or, if outside the WUI, must be in condition classes 2 or 3 fire regime groups I, II, or III.
- The project is not located: in congressionally designated Wilderness and Wilderness Study Areas; in areas where the removal of vegetation is restricted or prohibited by statute or by Presidential proclamation; or in areas where the proposed activities would be inconsistent with the applicable Land and Resource Management Plan.
- The project's number of acres treated does not exceed 3,000 acres.

- The project does not include the establishment of permanent roads, but may allow for necessary maintenance and repairs of the existing permanent road system and may allow for the construction of temporary roads that would have to be decommissioned no later than three years after completion of the project.
- The project is developed and implemented through a collaborative process.
- The best available scientific information is considered to maintain or restore ecological integrity, including maintaining or restoring the structure, function, composition and connectivity.
- The project maximizes the retention of old growth and large trees, as appropriate for the forest type, to the extent that the trees promote stands that are resilient to insect and disease.

The South Fivemile project is designed to meet these requirements, as described through this letter. Prior to initiating scoping, I worked with the Wasco County Forest Collaborative and local Tribal representatives to refine the proposed action.

Purpose and Need for Action

The landscape within the project area exhibits a different pattern of forest cover and structure types compared to what historically existed there. These changes, due to past management practices such as fire suppression and logging, have altered the natural succession of the forest (USDA Forest Service 2004). For example, the average patch size has decreased, and the number of patches has increased. Crown closure has also increased. Stands once differentiated by stocking levels, canopy levels, and crown closure have become structurally more similar and continuous across the project area. These changes have affected the normal functioning of ecological processes, such as fire, insects, and disease relationships.

The South Fivemile project area has a high density of trees and missed several fire cycles, which has created competition for nutrients, water, light, and growing space thereby limiting their natural development. The high density of trees has also created a corridor in which insect and disease can easily spread. Insects and diseases are natural elements of the ecosystem that can exert equal, if not greater, influence on forest development and conditions as fire. Most of these organisms have co-evolved with their host species over thousands of years. The balance between forests and their major pathogens is dynamic and fluctuates through time. In the past, with regular fire cycles, they probably existed most commonly at endemic levels (i.e., present in the area, but causing low or moderate levels of mortality). However, population fluctuations were normal with epidemic conditions of some insects or diseases developing periodically and causing high levels of tree mortality over short periods (Harvey et al. 1995). The most common insects and diseases currently impacting or at risk of impacting the South Fivemile project area are dwarf mistletoe, laminated root rot, western bark beetle, and mountain pine beetle.

Therefore, the primary purposes of this project are to reduce the risk of landscape level disturbance and increase forest resiliency to insect and disease.

Appendix A includes draft project design criteria (PDC). Appendix B includes a table which shows existing unit conditions. Appendix C includes project maps.

Proposed Action

In order to address insect and disease threats within the project area, the proposed action would reduce stand density on 2,997 acres. All areas proposed for treatment would be thinned from below, with the intention of prioritizing the retention of the largest and healthiest trees available within the stands. A variety of methods, including mechanical and non-mechanical (i.e., hand-crews), would be used. These methods include but are not limited to: precommercial thinning, commercial thinning, mastication, piling, and burning.

The proposed action would move density levels to a more desired condition of approximately 40-120 square feet of basal area or an estimated 20-100 trees per acre. An emphasis would be placed on removing conifer encroachment around existing legacy ponderosa pine and Oregon white oak. Where site conditions allow, sapling thinning (pre-commercial thinning) would treat to approximately 40-100 trees per acre, as well as brush and piling treatments, would occur in order to promote and develop more diverse stand conditions. Prescribed burning, pile burning, and/or other mechanical fuels treatments would be applied to these treatment areas as well. Based on current stand inventory data none of the stands exhibit late successional characteristics as described by the Northwest Forest Plan (see attached table 1). Thus, the proposed action does not intend to treat any stands within old-growth habitat. In order to maximize the retention of large trees, however, the proposed action would primarily focus on thinning of intermediate and suppressed trees, with the goal of promoting the growth of the larger trees while mitigating the loss of older trees from competition related stress. Additionally, in order to support the development of old-growth habitat conditions and preserve large trees, canopy cover within suitable northern spotted owl habitat would be downgraded or retained at 40-60% based on the guidelines from the Northern Spotted Owl Recovery Plan. Last, there would be proposed treatments in designated Riparian Reserves to maintain or improve the forest health of the stand. Treatments could range from 30% canopy cover within pine oak habitats to 40-50% canopy cover within dry mix conifer stands.

The proposed action would not construct any system roads. It is expected that temporary roads would be needed to facilitate activities. The exact location of temporary road segments are unknown at this time. All temporary roads would be decommissioned no later than three years after the project has been completed.

Implementation would require some equipment crossing of trails and temporary closures including the Bottle Prairie trail (#455) and the Eightmile Loop trail (#496). PDC would limit impacts to trails and trail users.

Table 3. Summary of proposed treatment types.

Treatment Type	Approximate Acres
Commercial Thinning	1,833
Non-Commercial Thinning	1,164
Total	2,997

Anticipated Effects

The interdisciplinary team has completed a preliminary effects analysis to consider extraordinary circumstances and potential impacts to resources in the project area. A consistency review of the Forest Plan was also part of this preliminary effects analysis. This preliminary effects analysis considered impacts to fish species and habitat, wildlife species and habitat, botanical species and habitat, invasive species, hydrology, soils, fuels, forest vegetation, transportation, heritage resources, recreation, and visual quality. Because impacts for most resources are anticipated to be minimal and/or short-term, only the anticipated effects for sensitive species and habitat are summarized below. Project activities are anticipated to be consistent with the Forest Plan as amended by the Northwest Forest Plan and other relevant law, regulation, and policy.

Wildlife

The project area contains dispersal and suitable habitat for federally listed northern spotted owls (NSO) and NSO designated critical habitat. Because proposed activities would downgrade some nesting, foraging and/or roosting habitat (less than 600 acres) the anticipated effects determination is **Likely to Adversely Affect (LAA) NSO and NSO critical habitat**. Because the current condition of habitat in the project area is marginal, and because long-term benefits to the conservation of NSO critical habitat are anticipated, the analysis is anticipated to reveal no extraordinary circumstances that would preclude use of this Categorical Exclusion. Wildlife Region 6 (R6) sensitive species include the Gray wolf and Dalles sideband. The Dalles sideband is also a Survey and Manage species. Because of project design criteria, proposed activities **may**

impact individuals or habitat but will not likely contribute to a trend towards federal listing or cause a loss of viability of the population or species (MIIH).

Fish and aquatic fauna

The project action area contains federally listed Mid-Columbia Steelhead, and Mid-Columbia Steelhead designated critical habitat is present in Eightmile Creek and Fivemile Creek (including both Middle Fork and South Fork). Because of project design criteria, the anticipated effects determination is **Not Likely to Adversely Affect (NLAA)** Mid-Columbia Steelhead and designated critical habitat. Aquatic R6 sensitive species include: Pacific lamprey, Coastal cutthroat trout, Rainbow/interior redband trout, Rocky mountain dusksnail, and Cope's giant salamander. Aquatic Survey and Manage species include: Rocky mountain dusksnail and Basalt juga. Because of project design features, proposed activities **may impact individuals or habitat but will not likely contribute to a trend towards Federal listing or loss of viability to the population or species (MIIH).**

Botany

There are no federally listed threatened or endangered species or designated critical habitat for botanical species in the project area. Botanical R6 sensitive species include: Sickle-pod rockcress, Nevius' onion and Survey & Manage/R6 Sensitive fungi species (see project record for full list of species considered). Because of project design criteria, the proposed activities **may impact individuals or habitat but will not likely contribute to a trend towards Federal listing or loss of viability to the population or species (MIIH).**

Anticipated Analysis

Based on this preliminary analysis, I have determined this project will likely fall within a category of action that is excluded from documentation in an environmental assessment or environmental impact statement. Specifically, this project meets the requirements of Section 603 of the Healthy Forest Restoration Act (16 U.S.C.6591b). An insect and disease project may be categorically excluded under this authority in a project that is designed to reduce the risk or extent of, or increase the resilience to, insect or disease infestation (HFRA, Sections 602(d) and 603(a)). If the analysis process determines that there are no extenuating circumstances that would preclude the use of this categorical exclusion, the project would adhere to the specifications of that authority.

How to Comment

The purpose of this letter is to invite your participation during our public scoping process. Any comments you may have at this stage of project development are welcome. In particular, if you have information you feel that I may not be aware of, or have concerns regarding this proposed action, please participate in this process. Comments received by **February 17, 2022** will help to inform the environmental analysis and decision-making process.

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

Comments can also be submitted via mail to South Fivemile Insect and Disease Project, c/o Ashley Popham, Barlow Ranger District, 780 NE Court Street, Dufur OR 97021.

Comments received in response to this solicitation, including names and addresses of those who comment, will become part of the public record for this proposed action and may be available for public inspection. Comments submitted anonymously will be accepted and considered; however, anonymous comments will not provide the agency with the ability to provide the respondent with subsequent environmental documents nor will it provide the respondent with standing to participate in subsequent administrative judicial review.

Additionally, pursuant to 7 CFR 1.27(d), any person may request the agency to withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under the FOIA, confidentiality may be granted in only limited circumstances, such as to protect trade secrets. The Forest Service will inform the requester of the agency's decision regarding the request for confidentiality, and where the requester is denied; the agency will return the submission and notify the requestor that the comments may be resubmitted with or without name and address within seven days.

Additional Information and Project Contact

Additional information can be found on the [South Fivemile Insect and Disease Project website](#). For questions, please contact Whitney Olsker, silviculturist at 541-467-5155 or whitney.olsker@usda.gov or Ashley Popham, NEPA Planner at 541-340-4073 or ashley.popham@usda.gov. I can be contacted at kameron.sam@usda.gov.

Sincerely,

KAMERON C. SAM
District Ranger