Kameron Sam
District Ranger
Barlow Ranger District
780 Court Street, Dufur, OR 97021

December 2, 2021

RE: South Five Mile Insect and Disease Project

Dear District Ranger Kameron Sam,

Please accept this comment letter on behalf of the Wasco County Forest Collaborative. The collaborative appreciates our partnership with the Mount Hood National Forest and the commitment to engaging the collaborative in the South Five Mile Insect and Disease Project. The collaborative recognizes the additional time, energy, and engagement that Forest Service staff have invested in the process and our partnership.

Project Objectives

The South Five Mile Insect and Disease Project is aligned with numerous collaborative interests, including:

- Conduct treatments in priority locations as identified by the Wasco County Community Wildfire Protection Plan and Wasco County Joint Chiefs initiative areas.
- Enhance drought preparedness and increase resistance and resilience to insect and disease outbreaks.
- Support production of restoration by-products that employ local workers and contribute to rural economic development and community well-being.
- Improve wildlife habitat for species including deer, elk, turkey, and squirrel, while retaining adequate habitat for Federally protected and sensitive species such as northern spotted owl, winter steelhead trout, and pine marten.
- Retain and promote old and large trees, especially drought tolerant species such as Oregon White Oak and Ponderosa Pine.

Wasco County All-Lands Joint Chiefs Projects

Collaborative partners are actively working with the Mount Hood National Forest to plan and implement two Joint Chiefs projects in Wasco County. The collaborative appreciates the Forest Service focus on planning and implementing all-lands forest restoration and management activities in these high priority locations. South Five Mile represents an important contribution to achieving the overall goals of landscape resilience and wildfire risk reduction as described in the North Wasco County Joint Chiefs initiative.

Community Wildfire Protection Plan

The South Five Mile Insect and Disease Project aligns with the Wasco County Community Wildfire Protection Plan (CWPP, 2005). The county is currently updating the CWPP. Forest Service engagement in the CWPP update process will be helpful to ensuring the county has access to recent and current projects that contribute to achieving the goals of the CWPP, including the South Five Mile project. Wasco County planners have requested input from the Wasco County Forest Collaborative regarding past, current, and future priorities for forest restoration and wildfire risk reduction. This information will inform the CWPP updated process. The collaborative would like to work with the Mount Hood National Forest to provide the requested input to the county.

Design Features

The collaborative appreciates the inclusion of project design criteria and best management practices in previous insect and disease projects. The collaborative supports utilizing PDCs and BMPs to inform project planning and implementation in line with the best available science. BMPs and PDCs serve as a helpful guide in ensuring the project will be implemented to balance multiple resource objectives, protect important resource values, and meet the interests of collaborative partners. Collaborative members offer the following comments and questions as the Forest Service works to finalize the South Five Mile Insect and Disease project:

Vegetation

There is collaborative agreement to conduct active management (commercial and non-commercial thinning, prescribed fire, etc.) to reduce tree density, increase species diversity and heterogeneity (favoring drought- and fire-tolerant species), reduce risk of future insect and disease outbreaks, and improve wildlife habitat.

While collaborative members recognize that forest insects and diseases serve important ecological functions in nutrient cycling, wildlife habitat, and forest succession, there is agreement that the need to reduce risk of future insect and disease outbreaks can be addressed through active management.

Healthy Forest Restoration Act (HFRA) maximizes the protection of old growth and large trees as appropriate for the stand type. The collaborative supports the Forest Service proposal to protect legacy Ponderosa pines and Oregon White Oak by removing nearby competing vegetation, such as encroaching fir.

There is not collaborative consensus on how to treat large diameter (>21”) Douglas firs (DF) in areas which lack large live trees and snags, especially in pine-oak stands and in land allocations such as B5 (Pine Marten/Pileated Woodpecker). The collaborative would like to explore

retention, removal, drop and leave, girdling, and topping of large DF to meet the Purpose and Need and the interests of partners. Large DF trees are providing important habitat and structure and would provide important future snag habitat if retained. At the same time, large DF on dry sites visited during a recent collaborative field tour showed signs of insect and disease, likely a result of recent drought, and are not as well adapted to hotter and drier conditions anticipated in the future. The collaborative would like to learn more about proposed treatments in pine-oak stands with large diameter DF to learn more about tradeoffs associated with stand health and wildlife habitat.

In maps and project documents please clarify what types of treatments (mechanical thin only, mechanical + prescribed fire, prescribed fire only) will be used in each respective unit.

Fuels

Collaborative members recognize that covering piles improves the ignitability and overall combustion of fuels in piles. Whenever possible, collaborative members would appreciate utilizing an environmentally friendly covering and/or removing the plastic prior to burning the pile.

Based on the information presented by Forest Service specialists collaborative members appreciate the inclusion of a PDC that requires burning piles within two years of construction. Pine engraver beetles, like Ips beetles, are drawn into stands containing fresh slash and then proceed to feed on small pines once the slash has been consumed.

Temporary Roads

The collaborative supports the Forest Service utilizing the existing road system. This approach will reduce both implementation costs and impacts on soils, wildlife, and other resource values. If there are temporary roads required to implement the project, collaborative members would like to set aside time at a future meeting to learn more about any proposed road building activities.

Soil Resources

Collaborative members appreciate the inclusion of project design criteria to protect soil resources in previous insect and disease projects. The collaborative would like to work with the Forest Service to receive periodic updates on the efficacy of these measures throughout project implementation. Lessons learned through implementation and monitoring may be able to inform future collaborative agreements and Forest Service projects.

Riparian Reserves

There is not full consensus to conduct commercial logging in Riparian Reserves. Collaborative members are interested in learning more about proposed insect and disease treatments in

Riparian Reserves. Specifically, what is the existing condition of the unit(s)? What types of treatments will be proposed and in which units? What is the future desired condition of the treatment units? How do the treatments contribute to reduced insect and disease risk in the planning area? How do treatments affect the future influx of dead wood in the short and long term? Why are the treatments needed to meet the goals of the Aquatic Conservation Strategy (ACS)?

The collaborative supports in-stream aquatic restoration projects. There may be riparian and aquatic restoration activities in the South Five Mile project area already approved through the Pacific Northwest Region Aquatic Restoration Project Environmental Assessment and Decision Notice. Implementing these activities simultaneously with the vegetation management treatments may result in efficiencies and support integrated restoration objectives. Please let the collaborative group know if there are such riparian and aquatic restoration activities in the South Five Mile area and whether you would be able to initiate them concurrently with the project.

Fish and Wildlife

Vegetation treatments and re-introducing prescribed fire in the project area will improve habitat for numerous wildlife species. To the extent practicable, collaborative members would like to see treatments that provide complex structure, such as gaps with "skips" that can provide cover for wildlife. Gaps may be achieved through consideration of topography, riparian buffers, and logging systems/operability and seek to maintain a diversity of age classes, patchiness, and dead wood. Collaborative members appreciate the integration of design features focused on retaining snags where safety permits and retaining live trees that have elements of wood decay.

Collaborative members recognize that the vast majority of the project area is within designated Critical Habitat for northern spotted owl, and that the area also includes the Mt. Hood LRMP B5 Pine Marten/Pileated Woodpecker land allocation on 633 acres (21%) of proposed treatment units. In addition, the primary aquatic species of concern within the Fivemile watershed is winter steelhead trout, which are grouped into the Middle Columbia River Ecologically Significant Unit[1]. Collaborative members would appreciate a discussion of potential effects to these species and/or their habitat from the Proposed Action prior to the Final Decision and encourage the integration of project design features focused on retaining and/or improving suitable habitat.

Prescribed Fire

Collaborative members support implementation of prescribed burns and would like to work with the Forest Service to increase the scale of prescribed burning on the landscape. The

[1] https://www.salmonrecovery.gov/Files/RecoveryPlans/mid-c-plan.pdf

collaborative would like to partner with the Mount Hood National Forest to assist with outreach to local communities and landowners.

Rural Economic Development

The project will result in the production of restoration by-products for local wood products businesses and employ local workers through restoration activities (e.g. thinning, mastication, prescribed burning). Collaborative members appreciate the opportunity to find win-win solutions that improve ecological conditions and result in local economic activity.

Community Engagement

As part of the implementation plan, the Wasco County Forest Collaborative would like to work with the Mount Hood National Forest to publish a press release to local media outlets, or another type of community-oriented information-sharing outlet to let members of the public know what is happening on public lands. Sharing information with the public about the outcomes of collaborative projects and our shared interests in all-hands, all-lands forest restoration and sustainable natural resource management is important to building and maintaining community support for this work.

Implementation and Monitoring: Collaborative Process Considerations

All members of the collaborative are committed to working with the Forest Service to build consensus agreements and be transparent about our interests and concerns. As part of the ongoing development of the project, collaborative members respectfully request the following process considerations:

- Continued regular updates regarding the status of the project provided at the monthly Wasco County Forest Collaborative meetings.
- Once the Forest Service has made a decision, schedule a project briefing to provide the collaborative with an overview of the Forest Service's decision and an opportunity to discuss how collaborative input was integrated into the project.
- Follow up discussion about how the Forest Service and Wasco County Forest Collaborative would like to work together through implementation and effectiveness monitoring.

Collaborative Membership

The Wasco County Forest Collaborative includes eleven voting members appointed by the Wasco County Board of Commissioners. The following individuals were appointed by the Wasco County Board of Commissioners to represent diverse interests at the collaborative table:

Tribal – Bob Sjolund, Confederated Tribes of Warm Springs
Community Wildfire Protection – Kristin Dodd, Oregon Department of Forestry
State Agency – Jeremy Thompson, Oregon Department of Fish and Wildlife

Private Landowner – Larry Magill, Wamic
Water Resources – Pat Davis, White River Watershed Council
Recreation and Tourism – Kathy Long, NOMAC
Local Government – Ryan Bessette, Wasco County Soil and Water Conservation District
Environmental – Brenna Bell, Bark
Forest Products – Jeremy Grose, Green Diamond Resource Company
At-Large – Rich Thurman, Retired Wildlife Biologist
At-Large – John Nelson, School District 21 Board Member

Thank you for the opportunity to provide input to the Mount Hood National Forest. We appreciate your consideration of collaborative interests and look forward to working with your team throughout the implementation and monitoring of this project.

Sincerely,

Andrew Spaeth
Facilitator
Wasco County Forest Collaborative
wascoforest@gmail.com