

REGIONAL ECOSYSTEM OFFICE

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MEMORANDUM

DATE: June 29, 2017

TO: Alice Carlton, Forest Supervisor, Umpqua National Forest

FROM: Jessica Rubado, Regional Ecosystem Office Representative to the Regional Interagency Executive Committee

SUBJECT: Regional Ecosystem Office Review of the Elk Creek Restoration Project on the Tiller Ranger District of the Umpqua National Forest

Summary: The Regional Ecosystem Office (REO) Interagency Late-Successional Reserve (LSR) Work Group has concluded its review of the information provided by the Tiller Ranger District, Umpqua National Forest (Forest) regarding the proposed Elk Creek Restoration Project (Project). The REO, based upon the review by the LSR Work Group in 2014, 2015, and 2017, concurs with the Forest's finding that the proposed Project's actions are consistent with the Northwest Forest Plan (NWFP) Standards and Guidelines (S&Gs).

Basis for the Review: Risk reduction actions are to be reviewed by the REO under Guidelines for Risk Reduction projects, pages C-12 through 13 of the S&Gs for the NWFP. Silviculture activities require REO review per page C-12 of the NWFP S&Gs. The REO may develop criteria that would exempt some activities from review (e.g., REO exemption criteria memoranda referenced below). In addition, through their review of LSR Assessments (LSRA), the REO has identified those projects that are sufficiently described and found to be consistent with NWFP S&Gs and has determined in the LSRA review letters those activities that do not require further REO review.

As required by the NWFP S&Gs (per page C-11), an LSRA was prepared for the South Cascades LSR in 1998, and also prepared for the South Umpqua Galesville LSRA in 1999 (and subsequently amended in 2004). The REO's review of the South Cascades LSRA concluded that the silvicultural, risk reduction, and salvage activities described within the LSRA are consistent with criteria and therefore are exempted from subsequent project level REO reviews. The REO's review of the South Umpqua Galesville LSRA found the following types of actions exempt from REO review: "short-term risk reduction actions as described on pages 65-66 which target activity fuels less than 3 inches diameter following treatment activities, except for the construction of shaded fuel breaks; creation of fuel breaks to reduce long-term risk; silvicultural activities that meet the criteria in the REO memoranda "REO Review Exemption Criteria" (April 20, 1995) or "Criteria to Exempt Specific Silvicultural Activities in Late-Successional Reserves and Managed Late-Successional Areas from Regional Ecosystem Office Review" (July 9, 1996) as modified by a September 30, 1996 amendment."

The Forest indicated, during presentations to the LSR Work Group during early Project meetings in 2014 and 2015, that it had determined several Project activities were exempt from additional

REO review. However, during these same meetings the Forest and LSR Work Group found that the acreage being proposed to be treated by prescribed fire and the fuel breaks proposed in LSR 222, as well as the legacy tree culturing and oak/pine treatments proposed in LSR 223, all required REO review as they were not consistent with the LSRA's exemption criteria in the associated REO review letters or the REO's silvicultural exemption letters.

Background and Elk Creek Project Description: The Project includes risk reduction and other silvicultural treatments. The Project's primary purpose is to reduce the threat of large scale wildfire to late successional habitats, with secondary benefit of restoring ecological function and resilience to the Elk Creek watershed and LSRs. The Project consists of treatments aimed at meadow restoration, oak-pine release treatments, young stand thinning, legacy tree culturing, shaded fuel breaks, prescribed fire treatments, roadwork (including decommissioning) and instream restoration.

Within LSR 222 the Project's proposed treatments include: 1) replacement of 8 culverts; 2) stormproofing of 0.7 miles of roads; 3) construction of 0.1 miles of new temporary road with a landing totaling 1/2 acre, with removal of both after use; 4) natural fuels underburning on 1,920 acres; 5) shaded fuel break construction along FS Road 1610-370 totaling 55 acres (2.6 miles); 6) non-commercial thinning with pile and burn fuels treatments on 15 acres to restore oak-pine habitat; 7) oak-pine restoration, meadow restoration, fuels reduction and legacy tree culturing on 112 acres by thinning of commercial sized trees; 8) treatment of activity fuels (70 acres hand pile & burn; 42 acres grapple pile); and 9) road maintenance. The non-commercial thinning with fuel treatments, and the oak-pine/meadow restoration and legacy tree culturing, were found by the Forest to be consistent with criteria in the LSRA that were identified by REO as exempted from further review. The prescribed fire unit, shaded fuel break treatments, and treatment of activity fuels require REO project level concurrence with the Forest's findings of consistency as the amount of prescribed fire treatment exceeds the annual acres treated guidance in the LSRA, the time period for which shaded fuel break treatments were exempted from REO review identified in the LSRA has expired, and there is no specific direction in the LSRA for treating activity fuels.

The objective of the prescribed fire unit in LSR 222 is to protect stand conditions for old growth associated species and reduce the risk of a large scale wildfire. The location of the 1,920 acre prescribed fire block was selected in part due to its containing an area modeled as having high suitability for large fire growth (Davis et al. 2011). Additionally, the unit size was selected to treat one of the largest intact blocks of late successional habitat in the LSR on the Tiller Ranger District, it avoided all but one known owl site, and was sited largely on drier forested stands with a south, southwest aspect. Though the prescribed fire block exceeded the annual treatment size allowed in the LSRA in one year on the Forest (1,460 acres allowed annually), it is less than the annual allowable acres of prescribed fire across the LSR as a whole (2,050 acres). Additionally, the LSRA allowed for a total of 48,000 acres of prescribed fire treatment over the first 20 years of implementation of the LSRA, but only 2,815 acres of prescribed fire has been accomplished in the LSR since 1998. Because the amounts of prescribed fire allowed within the LSR has only achieved 6% of the allowable 48,000 acres of treatment, and the need for risk reduction has not been abated by other treatments or wildfire, the LSR Work Group concurred that this prescribed fire unit was designed to be consistent with the NWFP risk reduction S&G's.

The shaded fuel break treatments proposed within LSR 222 were designed to be consistent with the recommendations for fuel break construction listed in the LSRA. However, the fuel break exemptions identified in the LSRA were only exempted for the first five years of implementation, therefore the District sought LSR Work Group concurrence that the proposed fuel break treatments were consistent with S&Gs for risk reduction projects. As the fuel break treatments focus on partitioning up high fire risk areas, are placed in areas with the potential for high fire behavior, avoid treating intact old growth stands, are treating near and within a Wildland-Urban Interface (WUI), and are focused on removing less than 7" diameter material, the LSR Work Group concurred with the Forest's determination that the shaded fuel break treatment was consistent with the NWFP S&Gs.

Treatment of activities fuels resulting from the oak/pine, meadow restoration, fuels reduction, and legacy tree treatments were discussed during the June 30, 2015, meeting, and the LSR Work Group concurred that this treatment was consistent with the NWFP risk reduction and silviculture S&Gs.

Treatments within LSR 223 include: 1) replacement of 6 culverts; 2) shaded fuel break construction along FS Roads 3201 and 3201-300 totaling 90 acres (4.1 miles); 3) pre-commercial thinning on 126 acres of plantations to improve stand complexity; 4) oak-pine restoration, fuels reduction and legacy tree culturing of commercial size trees on 105 acres; 5) 9 acres of commercial thinning to improve forest stand complexity; 6) treatment associated activity fuels (90 acres underburn; 23 acres hand pile & burn; 1 acre grapple pile); and 7) road maintenance. The oak-pine and legacy tree culturing treatments require REO project-level concurrence with the Forest's determinations of consistency as they are treating in stands over 80 years of age for risk reduction purposes. Remaining treatments (shaded fuel break to reduce long-term risk, pre-commercial commercial thinning, and activity fuels) do not require review because the Forest has determined they are consistent with criteria identified in the REO's pre-commercial and commercial silviculture exemption letters or are consistent with criteria in the LSRA that were identified by REO as exempted from further review.

The Forest indicated that primary purpose of the oak-pine and legacy tree culturing treatments are risk reduction in some unique LSR habitats, and therefore they are seeking REO concurrence that these treatments are consistent with the guidelines identified for treatments east of the Cascades and in the Oregon and California Klamath Provinces to reduce risks of large scale disturbance. This LSR is located within the Oregon Klamath Province. There are three criteria for activities designed to reduce risk in LSR's in older stands. Treatments may be appropriate if: 1) the proposed management activities will clearly result in greater assurance of long-term maintenance of habitat. The oak-pine and legacy tree treatments, when compared to the no action alternative analysis for the Elk Creek project, showed a clear reduction in within-stand reduced crowning fire index associated with the oak-pine and legacy tree treatments. Additionally, the USFWS in their Biological Opinion (BO) found the treatments would have short term impacts to spotted owl habitat, but over the longer term are anticipated to result in improved function and more resilient spotted owl habitat.

The second risk reduction criteria is: 2) the activities are clearly needed to reduce risks. The oak-pine and legacy tree culturing treatments are designed to reduce fuel loadings by reducing smaller understory trees, and opening canopies up to allow for decreased susceptibility to crown fire within these treated stands. The 2011 NSO recovery plan identified loss of NSO habitat to wildfire as one of the top three threats to spotted owl recovery, and the Elk Creek project was found to be consistent with recovery plan objectives to reduce the threat of loss of habitat from wildfire.

The third criteria is: 3) the activities will not prevent the LSR from playing an effective role in the objectives for which they were established. One of the primary roles for LSR 223 is to provide east-west connectivity between the Coast Range Province and the Cascade Province, in addition to providing late-successional habitat. The 105 acres of oak-pine and legacy tree culturing treatments are located on the easternmost edge of the LSR and in an area identified as WUI as it is surrounded on three sides by private lands and a residence. After treatment, long-term retention of these stands adjacent to degraded habitat on private lands should help to further the objectives of connectivity and habitat. Additionally, the USFWS BO found:

“Although the proposed action is located on both Matrix and Reserved lands, the overall intent of the proposed action is to restore historic ecosystem conditions and to prepare for anticipated effects of climate change. As such, both the Matrix and Reserved lands affected by the proposed action will continue to be managed to maintain and further restore older forest habitats to benefit a myriad of native species, including spotted owls. The proposed project will not appreciably reduce the likelihood of survival or recovery for the spotted owl population because the action area is expected to fulfill its role at the Provincial and Range-wide scales. The proposed action is planned consistent with the Standards and Guidelines of the NWFP. In addition, further habitat conservation benefits are anticipated because the proposed action is reasonably consistent with Recovery Actions 6, 10, 12 and 32 of the spotted owl recovery plan.” (p.67)

Therefore, the LSR Work Group concurred with the Forest’s finding that the oak-pine and legacy tree culturing treatments were consistent with the risk reduction guidelines on pages C-12 and 13 of the NWFP.

Review of the Project: Information considered by the REO include the May 28, 2014, and June 29, 2015, meetings. The REO also considered information presented during the June 1, 2017 meeting when the Forest presented a PowerPoint on the overall project, with specific focus on treatments that were previously identified by the LSR workgroup as needing additional REO review.

Conclusion: Based upon the REO’s review, the REO concurs with the Forest’s conclusion that the Project’s activities, if implemented as described above, are consistent with the NWFP.

If you have questions regarding this review, please contact Doug Young at 503-808-2014.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica Rubado". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jessica Rubado

Regional Ecosystem Office Representative to the Regional Interagency Executive Committee

cc: Doug Young, LSR Workgroup, FS

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