

REGIONAL ECOSYSTEM OFFICE

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MEMORANDUM

DATE: 9/13/2019

TO: Ted MacArthur, Forest Supervisor, Six Rivers National Forest

FROM: Becky Gravenmier, Regional Ecosystem Office Representative to the Regional Interagency Executive Committee

SUBJECT: Regional Ecosystem Office Review of the Akerwoods Fuels Reduction Project, Six Rivers National Forest

Summary: The Regional Ecosystem Office (REO) interagency Late-Successional Reserve (LSR) Work Group has concluded its review of the Akerwoods Fuels Reduction Project (Project), in the Eel River LSR (LSR307) on the Six Rivers National Forest (Forest). The project proposes to create a shaded fuelbreak along forest roads that follow a major ridge system, on roughly 1,050 acres, of which approximately 525 acres are within LSR307. The shaded fuelbreak will be created using a commercial thin from below prescription modified with some spacing elements and disposal of activity fuels via piling and burning. The REO is reviewing the Project for consistency with standards and guidelines in the Northwest Forest Plan. The REO, based upon the review by the LSR Work Group, concurs with the Forest's finding that the proposed actions are consistent with the Northwest Forest Plan (NWFP) Standards and Guidelines (S&Gs):

Basis for the Review: The Eel River LSR is addressed under the Six Rivers National Forest Late Successional Reserve Assessment (LSRA), which was prepared in 1999 and reviewed by the REO (Review Letter dated 3/3/2000) and found consistent under the NWFP S&Gs (C-11). The review letter exempted certain fuelbreak projects which include a large portion of the Akerwoods project, however, the current project includes several elements that differ somewhat from the design features exempted in the LSRA review. This includes about 50 acres of fuelbreak along a major road and some spur roads that were not listed in the LSRA project description, a few locations where the width of the fuelbreak exceeds the 1,000 upper limit in the LSRA, and the fact that several stands will have commercial thinning of trees greater than 20" dbh. These project elements were not exempted in the LSRA review, therefore this risk reduction project is being reviewed by the REO to determine consistency with risk reduction standards and guidelines (C-12, 13).

Background and Project Description: The project intends to create shaded fuelbreak on about 1,050 acres, with approximately 525 acres with LSR307 on the Mad River Ranger District of the

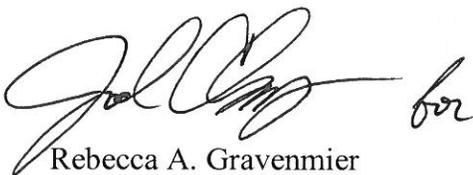
Six Rivers National Forest. Historic lightning occurrence and recent large fires in 2015 demonstrate the risk of loss of LSR habitat, and the LSRA documented that this area on the southern end of the Forest tends to be the driest and has considerable risk of loss to high severity fire. The fuelbreak would be 300 to approximately 1000 feet wide, averaging 300 feet, and located along Forest Roads 2S08 and 3S13, as well as several adjoining spur roads. These roads are generally located on a major ridge system. Portions of the fuelbreak wider than 300 feet occur on relatively steeper slopes and in younger stands. Approximately 85 percent of the project is situated along Forest Road 2S08, which was identified for fuelbreak development in the LSRA, with the remainder along road 3S13, which was not; however, road 3S13 follows the same ridge further south along the boundary of the LSR, and is consistent with criteria in the LSRA that support shaded fuelbreak creation and location.

The fuelbreaks would be created using a combination of precommercial thinning from below and a commercial thinning prescription. Existing late successional habitat would be treated using precommercial thinning with no trees larger than 8 inch dbh being thinned. The commercial thinning prescription would be applied outside of existing late-successional habitat and is focused on retaining the largest trees as well as any identified with specific habitat value, and removing smaller trees to achieve average crown cover of 40 – 60 percent, with retained trees having sufficient space for future crown and stem diameter growth. The thinning would retain large tree structure and shade on the fuelbreak, allow opportunities to stop the spread of wildland fire to reduce the risk of loss of spotted owl habitat in the LSR, and provide fire resilience for trees within the fuelbreak. No new road construction will occur with the possible exception of temporary roads if determined to be needed. These temporary roads will be obliterated upon completion of project activities. Hazard trees and snags capable of falling into the road prism would be felled. Hazard trees and snags greater than 100' from a road may be retained unless too numerous to meet fuelbreak objectives. Felled hazard trees would be limbed, lopped and scattered but logs would be retained as coarse woody debris. Tree harvesting would be limited to no larger than 30" dbh, with the following stands having lower diameter restrictions in order to minimize the chances of cutting trees greater than 130 years old (discussed as an important threshold in the LSRA); stands 10, 13 and 35 would have a 20" maximum DBH for felling. Stand 3 would have a 24" DBH upper diameter limit; and stand 6 would have a 26" DBH upper limit. These diameter limits are designed to meet the 40 to 60 percent canopy coverage required for the fuelbreak, given the inventoried diameter distributions by stand. The prescription endeavors to reach canopy cover and spacing requirements by thinning trees less than 20" DBH to the extent possible, and thinning larger trees up to the diameter cap only as necessary. Slash generated from the thinning would be disposed of by piling and burning conducted in a manner to avoid heat damage to residual trees.

Review of the Project: The LSR Work Group conducted a teleconference with Forest representatives on August 12, 2019, after having received the Akerwoods Fuels Reduction Consistency Review document, and supporting documentation on August 1, 2019. Forest personnel also provided email responses to LSR Workgroup questions on August 2, 14, and 16 2019. The LSR Workgroup based its review on these documents and concurs with the Forest's conclusion that the proposed treatment is consistent with the S&Gs and meets the objectives for LSRs for the following reasons:

- The project area is at high risk of uncharacteristically severe fire due to fire suppression and the trend of increasing severity of wildfires in these vegetation types in California. This risk was noted in the LSRA, and the project location and design will serve to reduce risk of loss of LSR stands with late-successional and old-forest habitat. The ridgetop location and road access combined with the reduction of ladder fuels, canopy bulk density, and snag hazards will reduce flame length and intensity of future fires and provide opportunity for suppression actions to stop fire spread.
- Adverse effects to LSR are avoided by project design. No trees larger than 8 inch dbh will be removed in existing late seral habitat within the project area. Approximately 15 percent of the project area within the LSR is in stands less than 80 years old, with the remainder in stands up to 130 years of age. The Forest has conducted considerable analysis to relate tree diameter to the threshold age of 130 years identified in the LSRA. Stand table data presented in support of the consistency review demonstrate that project objectives can be met while avoiding these older trees, and specific diameter limits lower than 30" dbh were specified for several stands to avoid this risk. These data also show that most of the thinning will occur within tree sizes somewhat less than the upper limit, although trees approaching the diameter limits may need to be removed in some cases to meet spacing and canopy cover targets for fuelbreak effectiveness.
- The shaded fuelbreak is consistent with projects identified in the LSRA, in fact a fuelbreak along road 2S08 is specifically identified. Road 2S13, and some short spur roads coming off these major roads are not listed in the LSRA, however they are consistent with fuelbreak criteria in the LSRA including fire risk, ridgetop location, and this portion of the fuelbreak is strongly dominated by stands less than 70 years old, including planted pine stands within the Douglas-fir zone. Also, the Forest has indicated the boundary of stand 6, which originally was approximately 1200' in width, has been changed and is less than 1,000 feet wide,

Conclusion: Based on the LSR Work Group's review, the REO concurs with the Six Rivers National Forest's conclusion that the Akerwoods Project is consistent with the NWFP risk reduction S&Gs. If you have questions regarding this review, please contact Jon Regelbrugge at 707-980-0138.



Rebecca A. Gravenmier

Regional Ecosystem Office

Forest Service Representative

cc: Jeff Jones, Carol Spinos, Debbie Anderson, Jon Regelbrugge