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Memorandum

Date: November 4, 2020

To: Wade McMaster, District Ranger, Gold Beach Ranger District, Rogue River-Siskiyou NF

From: Rebecca Gravenmier, Regional Ecosystem Office Representative to the Regional Interagency Executive Committee

Subject: Regional Ecosystem Office Review of the Sudden Oak Death Treatments 2020, Gold Beach Ranger District, Rogue River-Siskiyou National Forest

Summary: The Regional Ecosystem Office (REO) interagency Late-Successional Reserve (LSR) Work Group has concluded its review of the documents provided by the Forest regarding proposed sudden oak death (SOD) treatments in the South Coast Late Successional Reserve, Gold Beach Ranger District, Rogue River-Siskiyou National Forest. The REO, based upon review by the LSR Work Group, concurs with the Forest in its finding of consistency with the Standards and Guidelines (S&G) under the Northwest Forest Plan (NWFP) for the Sudden Oak Death Treatments 2020 Project.

Basis for the Review: Silviculture, risk reduction, and salvage treatments in LSRs are subject to REO review under the NWFP S&Gs (C-12-15). As required by the NWFP S&Gs (C-11), the Forest prepared a Late-Successional Reserve Assessment (LSRA), which was reviewed and found to be consistent under the NWFP S&Gs (C-11). The SOD treatment came before the LSR Workgroup for review because treatment of SOD was not covered in the LSRA.

Background and Project Description: *Phytophthora ramorum*, the cause of Sudden Oak Death (SOD), is an aggressive non-native pathogen that threatens the ecological integrity of tanoak forests in southwestern Oregon. SOD is subject to both state and federal quarantine regulations. Since the mid-1990s, SOD has killed tanoak trees in Curry County, OR and has caused twig and foliar diseases in many other susceptible plant species.
The Rogue River-Siskiyou National Forest is proposing to conduct 144 acres of risk-reduction treatments for Sudden Oak Death (SOD) in the South Chetco Late Successional Reserve (LSR). There are 7 treatment units. These treatments are designed to slow the spread of invasive *Phytophthora ramorum* where it has been identified as part of on-going SOD monitoring.

Treatments include direct herbicide injection into the boles of infected tanoak, cutting infected tanoak, cutting tanoak within 50-300 feet of infected tanoaks, and hand-piling and burning of

slash < 8" in diameter. Tanoak resprouts from underground burls, so herbicide injection of infected trees is needed to prevent resprouting and continued sporulation of the SOD pathogen on the sprouts. Burning is needed to kill the pathogen.

The proposed treatments will occur in younger stands (<80 years old) that have not yet developed late-successional characteristics as well as in older stands that have late-successional characteristics.

The proposed SOD eradication treatments have been used in Curry County since SOD was first detected there and they have been effective in limiting the spread of the disease when compared to the unrestricted spread in Humboldt County, California, where no SOD eradication treatments have been applied.

The area to be treated is in the SOD Quarantine Zone. Portions of the South Chetco, North Chetco, and Northwest Coast LSR occur within the SOD Quarantine Zone. All of these LSRs are in the Southwest Oregon LSR Assessment that was completed in 1995.

According to the SOD Risk Assessment Model, 149,998 acres (21%) covered by the SW Oregon LSR Assessment (Northwest Coast, South Chetco, North Chetco and other LSRs outside of the SOD quarantine zone) are at high or very high risk for SOD infestation. Efforts to reduce the risk of SOD spread from existing infestations are needed to prevent wider scale occurrence of the pathogen, which could have a detrimental impact on the ability of the LSR to provide habitat for late-successional species. The two primary tree species in the LSR are Douglas-fir and tanoak, with the more shade-tolerant tanoak providing the multi-canopy layer conditions that help define late-successional forest in this forest type. Tanoak also provides an important food source for small mammals – an important part of the food web in forests of all successional stages.

Earlier SOD risk reduction treatments in the South Chetco LSR total 346 acres. The total amount of treatment in the South Chetco LSR after the proposed treatments are completed will be 0.7% of 71,382 acres. Of that 71,382 acres, 67,404 acres are in the SOD Quarantine Zone, and most of those acres are high or very high risk for SOD infestation.

Review of the Project: The Sudden Oak Death Project was presented to the LSR work group on August 20, 2020 and a draft of the consistency document was sent to the work group to be reviewed on October 10, 2020. Comments from the LSR work group were incorporated and documented in this final consistency review.

The interagency LSR Work Group review concluded that the proposed treatment is consistent with Standard and Guidelines for Risk Reduction Projects in LSRs (C-12-13). Treatments in older stands are appropriate in this situation for the following reasons (NWFP S&Gs C-13):

- The result of the management activities will clearly result in greater assurance of long-term maintenance of habitat.
- The activities are clearly needed to reduce risks.
- The activities will not prevent the LSR from playing an effective role in the objectives for which they were established.

Conclusion: Based on the interagency REO LSR Work Group's review of relevant documentation and discussion with Rogue River-Siskiyou NF staff, the REO concurs with the Forest's conclusion that the Sudden Oak Death Treatments 2020 Project is consistent with the Northwest Forest Plan.

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