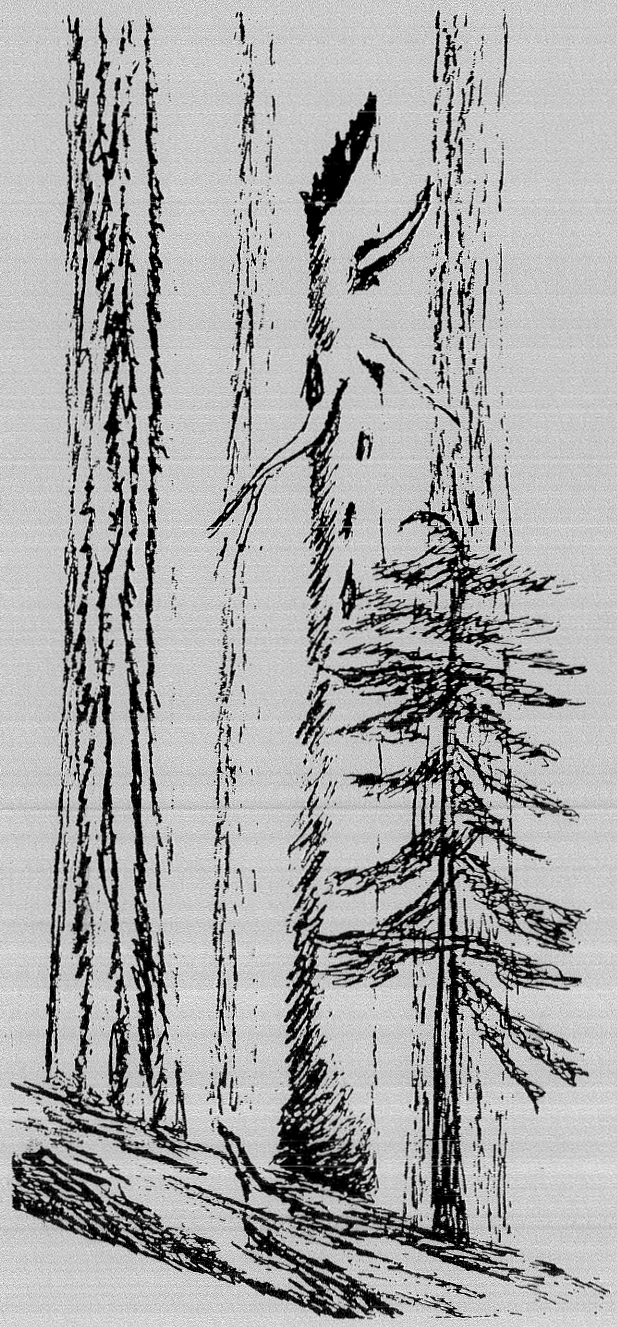
LATE-SUCCESSIONAL RESERVE ASSESSMENT

for Oregon's

Northern Coast Range

Adaptive Management Area



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Original data for this analysis was compiled from multiple sources and may not meet the U.S. National Mapping Standards of the Office of Management and Budget. For specific data source dates and scales, or for additional digital information, contact the Forest Supervisor, Siuslaw National Forest, 4077 Research Way, Corvallis, OR 97333. The maps in this document have no warranties to their content and accuracy.

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MEMORANDUM

DATE: November 13, 2006

TO: Forest Supervisor, Siuslaw National Forest

FROM: /s/Anne Badgley, Executive Director

SUBJECT: Clarification of Memo #940 and Memo # 1058

This letter concerns two memos issued from this office which are in need of clarification. The Regional Ecosystem Office memos, #940 (dated June 6, 1997) and # 1058 (dated December 17, 1997) each contain the following paragraph:

> *"Projects meeting the criteria in the REO memoranda "REO Review Exemption Criteria" (dated April 20, 1995) and "Criteria to Exempt Specific Silvicultural Activities in Late-Successional Reserves and Managed Late-Successional Areas from Regional Ecosystem Office Review" (July 9, 1996 and amended September 30) continue to be exempted from the REO review. In addition, silvicultural activities described on, and consistent with the criteria listed on, Table 7 (as supplemented by April 22, 1997 documentation) and consistent with NFP S&Gs are exempt from subsequent project-level REO review."*

Through this letter, this paragraph in both memos is corrected with the following change noted in bold.

> *"Projects meeting the criteria in the REO memoranda "REO Review Exemption Criteria" (dated April 20, 1995) and "Criteria to Exempt Specific Silvicultural Activities in Late-Successional Reserves and Managed Late-Successional Areas from Regional Ecosystem Office Review" (July 9, 1996 and amended September 30) continue to be exempted from the REO review.* ***Alternatively****, silvicultural activities described on, and consistent with the criteria listed on, Table 7 (as supplemented by April 22, 1997 documentation) and consistent with NFP S&Gs are exempt from subsequent project-level REO review."*

Projects need to meet either the REO exemption memo criteria or the Late-Successional Reserve Assessment criteria that has been reviewed by the REO, but do not need to meet both.

If you have any questions, please contact Shawne Mohoric, 503-808-2175.

cc: Shawne Mohoric, Region 6, FS (LSR Workgroup)
Frank Davis, Region 6, Siuslaw NF

2232/SMo

REGIONAL ECOSYSTEM OFFICE

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MEMORANDUM

DATE: December 17, 1997.

TO: Robert W. Williams, Regional Forester, Region 6, Forest Service
Elaine Y. Zielinski, State Director, Bureau of Land Management OR/WA

FROM: Donald R. Knowles, Executive Director Don Knowles

SUBJECT: Regional Ecosystem Office Review of the Northern Coast Range Adaptive Management Area Late-Successional Reserve Assessment

Summary

The Regional Ecosystem Office (REO) and the interagency Late-Successional Reserve Work Group have reviewed the Northern Coast Range Adaptive Management Area Late-Successional Reserve Assessment (LSRA). The REO finds that the LSRA, as supplemented by a December 1, 1997 LSRA revision document, provides a sufficient framework and context for future projects and activities within the LSR. Future silvicultural activities described in the supplemented LSRA (as discussed below) that meet its criteria and objectives, and that are consistent with the Standards and Guidelines (S&Gs) in the Northwest Forest Plan (NFP), are exempted from subsequent project-level REO review. Future salvage and risk-reduction activities that follow the assumptions noted in this letter, that meet criteria and objectives in this LSRA, and are consistent with the S&Gs in the NFP, are also exempted from project-level REO review, with one exception and one condition, described below.

Basis for the Review

Under the S&Gs for the NFP, a management assessment should be prepared for each large LSR (or group of smaller LSRs) before habitat manipulation activities are designed and implemented. As stated in the S&Gs, these assessments are subject to the REO review. The REO review focuses on the following:

1. The review considers whether the assessment contains sufficient information and analysis to provide a framework and context for making future decisions on projects and activities. The eight specific subject areas that an assessment should generally include are found in the NFP (S&Gs, page C-11). The REO may find that the assessment contains sufficient information or may identify topics or areas for which additional information, detail, or clarity is needed. The findings of the review are provided to the agency or agencies submitting the assessment.

2. The review considers potential treatment criteria and treatment areas addressed in the LSRA. When treatment criteria are clearly described and their relationship to achieving desired late-successional conditions are also clear, subsequent projects and activities within the LSR(s) may be exempted from the REO review, provided they are consistent with the LSRA criteria and NFP S&Gs. The REO authority for developing criteria to exempt these actions is found in the S&Gs (pages C-12, C-13, and C-18).

Scope of the Assessment and Description of the Assessment Area
The REO reviewed the LSRA for conformity of the eight subject areas identified in the NFP S&Gs (page C-11) and sought additional information regarding some of these subject areas. Supplemental information was submitted to the REO on December 1, 1997.

The LSRA addresses three large LSRs on the Salem BLM District and the Siuslaw National Forest, totaling 186,000 acres, with 66% of the acreage within the boundary of the North Coast Adaptive Management Area (AMA). These LSRs are in the northern half of the Oregon Coast Province. This assessment considers the LSR in the context of surrounding LSRs.

Review of the Assessment
The REO reviewed the assessment's description of the process to be used, and elements to be included in the desired future conditions, current conditions, objectives, treatment criteria, possible treatments, and identified projects, including the location of forest types to which they may be applied. The assessment provides a clear framework for designing future actions. The descriptions of current conditions, disturbance processes, successional pathways, and landscape level treatment priorities were particularly illustrative in providing a framework for future interdisciplinary teams to identify specific management needs and prescriptions.

Projects meeting the criteria in the REO memoranda "REO Review Exemption Criteria" (dated April 20, 1995) and "Criteria to Exempt Specific Silvicultural Activities in Late-Successional Reserves and Managed Late-Successional Areas from Regional Ecosystem Office Review" (July 9, 1996 and amended September 30, 1996) continue to be exempted from the REO review. In addition, silvicultural activities described on Table 21 of the MLSA that are consistent with these exemption criteria as revised under the Density Management section (page 100) and are consistent with NFP S&Gs are exempt from subsequent project-level REO review.

Risk reduction activities described in Table 21 (as supplemented by December 1, 1997 documentation) that are consistent with the NFP S&Gs are exempted from future project-level REO review with the following assumption:

> Treatment to reduce the risk of disease would not occur in stands >110 years old, and will be consistent with silviculture enhancement treatment criteria described in the LSRA, with the addition of emphasis on retention of disease resistant or non-host species.

Salvage activities described in Table 21 and on page 99 (both supplemented by December 1, 1997 documentation) that are consistent with the NFP S&Gs, are exempted from future project-level REO review.

However, there is another salvage activity described in the LSRA that is not exempted from future REO review. This is:

> Conflict with ACS strategy: The December 1, 1997 documentation provides supplemental language under the Salvage section (page 99) of the LSRA, stating that high levels of coarse woody debris (CWD) would be retained during salvage treatments "unless the interdisciplinary Team identifies a conflict with Aquatic Conservation Strategy objectives (i.e., blowdown on steep, unstable slopes above streams in which increased sedimentation is a concern), and recommends leaving moderate levels of CWD." The REO has not seen any information to support the idea that retaining the high CWD levels in the situation described in the LSRA would conflict with Aquatic Conservation Strategy Objectives. Thus, REO cannot exempt from review these salvage projects that do not retain high levels of CWD. Such projects should be submitted for project-level REO review.

We have chosen to provide a conditional exemption from REO project-level review for another type of lvage activity proposed in the LSRA. The December 1, 1997 supplemental documentation described ıggering conditions and criteria for removal of down trees along roads when the risk of theft was considered too high. The rationale behind the proposal was that removal of the wood to a point far enough from the road surface to hide the remaining wood from potential thieves may result in retaining more wood in the LSR in the long term. Also, removing visible wood from areas of active theft will reduce overall theft activity. As the Work Group discussed with you in the field, this proposal is not consistent with the Record of Decision (ROD) and, therefore, appropriate Forest and District plan amendments will be required. Moreover, the issue of how best to prevent road side theft has been raised from various units throughout the NFP area, and this proposed approach may have the potential for widespread application in LSRs beyond those covered by this assessment.

The proposal has several additional uncertainties: its ecological effects; the effectiveness of reducing wood theft; and the magnitude of the treatment (though expected to be small). Given the possibility of ultimately retaining more CWD in the LSR by adopting the proposal than would be retained if theft occurred, the REO exempts this project in this assessment area from review for calendar year 1998, with the following understanding.

At the end of 1998, the LSR work Group and REO staff would like to visit with your staffs to discuss several points, including:
(a) the frequency and magnitude of potential theft situations,
(b) the ecological effects of the treatment,
(c) the effectiveness of the treatment in meeting management objectives for managing wood theft, and
') the potential for broader application of this type of treatment.

To facilitate these future discussions, we understand that you plan to assemble the following types of information:
(a) number and locations of situations where the proposed treatment was and was not applied,
(b) related documentation, including evidence of theft, and
(c) your staff's conclusions on the effectiveness of the treatment.

The REO believes this information and review will help us in a determination of whether the proposed treatment should continue to be exempted from review, whether modifications may be necessary to the proposed treatment, and whether the proposed treatment or modified treatment may have applicability in areas outside this assessment area.

The REO is working with the Research and Monitoring Committee (RMC) to ensure that projects within LSRs, including projects exempted from the REO review, are considered in the development of the Implementation, Effectiveness, and Validation Monitoring Programs. We also expect the local units to continue their long-standing partnership with key researchers regarding management of late-successional stands, particularly in the area of young-stand management. Specific to the proposed treatment to remove down wood subject to theft along roadsides, the REO will ask the RMC to investigate the issues involved in balancing the needs to manage theft against the ecological benefits of CWD.

Most of the LSR acreage in this assessment is also within the boundaries of the North Coast AMA. As ıted in the supplemental documentation, LSR S&Gs and objectives will be met until such time as an .ıMA plan (supported by NEPA) is developed and approved, and which specifies changes in the land allocations or standards and guidelines of LSRs within this AMA (S&Gs, page D-15). Any changes in these S&Gs would require REO review.

The REO recognizes that silvicultural enhancement treatments may occur within LSRs in the North

Coast AMA in stands up to 110 years old (S&Gs, page C-12) and exempts these treatments, as described within the LSRA and consistent with the NFP, from future project-level review. We refer your staff to field notes compiled by the REO LSR work group members during a site visit on October 2 & 3, 1997. These notes, which we have retained in our files and which document our considerations for such types of treatments, were recently sent to your staff.

Conclusion

Based on documentation found in the LSRA and the amended information, the REO finds that the LSRA provides a sufficient framework and context for future projects and activities within the LSR. As identified above, silvicultural activities and specific projects identified in amended Table 21 and further described in the LSRA which are consistent with the NFP S&Gs and the treatment criteria identified in the assessment, and meet the above assumptions and exceptions, are exempted from subsequent project-level REO review. When it is completed, please send a final copy of the LSRA to REO for our files.

cc:
REO,RIEC
Clark Tiecke, BLM-Salem
Wayne Patterson, Hebo RD

1058/ly

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