

Regional Interagency Executive Committee

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Memorandum

Date: February 24, 2020

To: Sherri Chambers, District Ranger, North Umpqua Ranger District,
Umpqua National Forest

From: Becky Gravenmier, Regional Ecosystem Office Representative to the Regional
Interagency Executive Committee *Rebecca A. Gravenmier*

Subject: Regional Ecosystem Office/Late-Successional Reserve Work Group Review of the
Calf-Copeland Restoration Project, 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 Umpqua National Forest regarding the proposed Calf-Copeland Restoration Project (Project). The REO, based upon the review of the LSR work group in 2019 and 2020 concurs with the Forest's findings that the proposed Project's actions are consistent with the Northwest Forest Plan (NWFP) Standards and Guidelines (S&G's).

Basis for the Review: Risk reduction actions are to be reviewed by the REO under the Guidelines for Risk Reduction projects, pages C-12 through C-13 of the S&G's for the NWFP. Silviculture activities require REO review per page C-12 of the NWFP S&G's. 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. 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 stated in their review of the LSRA that fire risk management activities should be a priority in this LSR, and that the "amount of treatments proposed for exemption from further REO review, or the amount of projected treatments overall are not intended to represent the long term activity levels needed to reach desired future conditions."

Background and Project Description: The purpose of the Calf-Copeland Restoration Project is to provide greater landscape resiliency to wildfire and other disturbances, restore the health and vigor of sugar and ponderosa pine, provide conditions for better protection of life and property within the Wildland Urban Interface (WUI), and to restore watershed conditions within the planning area. The project has been in development since 2014, and in 2017 much of the planning area was burned as part of the Umpqua North Complex fires.

All units included in the Calf-Copeland project are within the South Cascades LSR. The proposed action would 1) thin 1,759 acres in stands over 80 years old for fire resiliency focusing on variable density thinning around mature sugar pine, 2) thin 282 acres in stands over 80 years of age by felling conifers under 7" around sugar pine, 3) utilize prescribed fire and pile burning over 3,895 acres of treated stands, 4) conduct maintenance burning (a second entry) of prescribed fire on 1,218 acres of the above described treated stands, 5) create defensible space around private property in the Dry Creek Wildland Urban Interface by thinning conifers less than 7" dbh over 132 acres, 6) create 1,420 acres of shaded fuel breaks along roadsides by thinning conifers less than 7" dbh, 7) implement variable density thinning on over 1,210 acres of plantation stands to reduce fuel loadings, 8) thin 193 acres of young stand plantations (non-commercial thinning), 9) thin 451 acres of plantation stands under 80 years old to accelerate the development of old growth characteristics, 10) hand plant 194 acres with disease resistant sugar pine in areas burned in the 2017 Umpqua North Complex fires, and 11) create 1 to 2 acre gaps over 5 total acres in plantation thins to support sugar pine restoration and long term fire resiliency. The thinning of stands over 80 years old, prescribed fire, defensible space, fuel break and gap creation treatments all require REO project level concurrence with the Forest's findings of consistency.

In evaluating this project, based upon the location, the species composition of the vegetation being proposed for treatment (sugar pine, and white oak), the predominance of the white fir ecological series and frequency of recent fire, the Forest proposed and the LSR workgroup concurred that this project area is more similar to the Oregon Klamath Province conditions than the West Cascade province, and therefore they should be able to utilize guidelines for areas in the Oregon Klamath Province for projects designed to reduce the risk of large scale disturbances. The 1,759 acres of commercial treatments and 282 acres of non-commercial thinning in stands older than 80 years of age are aimed at reducing the risk of stand replacement fire and are focused on increasing the resilience of sugar pine and meet the NWFP guideline in that they 1) are documented through fire modeling to increase both the torching and crowning indexes and make them less likely to experience high severity fire behavior post treatment, 2) the activities are clearly needed to reduce risk as the planning area has experienced recent wildfires within some and adjacent to other treatment units, and risk levels within stands remain high, and 3) the activities will not prevent the LSR from playing an effective role in maintaining habitat for late successional dependent species because the treatments are designed to restore historic stand species composition and structure in a condition more sustainable to future fire disturbance. Therefore, the proposed treatments in stands over 80 years of age are consistent with the NWFP standards and guidelines.

The South Umpqua LSRA identified prescribed fire as the primary method of reducing fuel loading in stands over 80 years, and the Calf-Copeland Project proposes 2,041 acres of prescribed fire in thinned units as well as 1,218 acres of maintenance burning in stands that were previously treated. The LSRA identified that prescribed fire projects were exempt from review

for the first five years (1998-2003), and identified that the Umpqua NF could treat up to 1,460 acres of prescribed fire annually for the first 20 years (1998-2018 for a total of 29,200 acres). In the intervening 22 years, very little prescribed fire has occurred in the LSR on the Umpqua, and none in stands over 80 years of age. Because the amounts of prescribed fire allowed within the LSR has been much below the amount allowed over the first 20 years of implementation, and the need for risk reduction has not been abated by other treatments or wildfire, the LSR work group concurred that these prescribed fire treatments are designed to be consistent with the NWFP risk reduction S&G's.

The shaded fuel break and defensible space treatments proposed within the LSR were designed to be consistent with the recommendations for fuel break construction listed in the LSRA. However, like the prescribed fire exemptions, 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 areas 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 and defensible space treatments are consistent with the NWFP S&Gs.

Silvicultural treatments proposed for the plantation stands less than 80 years old in the Calf-Copeland Project are consistent with pertinent S&Gs in the ROD (C-12-13), and with the LSRA treatment criteria for density management in stands less than 80 years of age and the existing review exemption criteria (REO Memorandum #694 dated July 9, 1996 and REO Memorandum #801 dated September 30) across 1,854 acres of thinning. The creation of 1 to 2 acre gaps for a total of 5 acres of gaps is not consistent with REO Memorandum's 694 and 801. However, these gaps are being proposed to be able to plant rust resistant sugar pine, ponderosa pine and Oregon white oak, and the increased gap size is needed to allow development of these fire adapted species plantings. As these plantings are aimed at restoring native, fire adapted species and they are limited to 5 total acres, the LSR work group concurs that the creation of these gaps are consistent with the NWFP S&G's around risk reduction and silvicultural treatments on pages C-12-13.

Review of the Project: The Calf-Copeland Project was presented to the LSR work group on November 22nd, 2019 and a draft of the consistency document was sent to the workgroup to be reviewed on December 9th, 2019. Comments from the LSR work group were returned the Forest on December 17th, 2019 and the final consistency document was sent to the LSR work group on February 11, 2020.

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.

cc:

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