

REGIONAL INTERAGENCY EXECUTIVE COMMITTEE

REGIONAL ECOSYSTEM OFFICE

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Memorandum

Date: August 24, 2023

To: Molly Juillerat, District Ranger, Middle Fork Ranger District, Willamette NF

From: Matthew Ehrman, Regional Ecosystem Office Representative to the Regional Interagency Executive Committee

Subject: Regional Ecosystem Office Review of the Larison POD Project, Willamette 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 risk reduction activities associated with the Larison Potential Operational Delineation (POD) Project, Middle Fork Ranger District, Willamette 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 Larison POD 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 the South Cascades Late-Successional Reserve Assessment (LSRA) in 1998, which was reviewed and found to be consistent under the NWFP S&Gs (C-11). The 1998 LSRA exempted from review a certain number of acres that would be treated within a five year period. The LSRA did not articulate whether or not acres of fuel break treatment would be exempted from review after that initial five year period and the Forest is proposing to treat more acres of fuel break in a one year period than what was listed in the LSRA. As such, the Forest has requested a consistency review of their proposed activities.

Background and Project Description: The project area is located just south of the communities of Oakridge and Westfir. A total of 8,690 acres of the project area are within LSR-222, representing 1.7% of the 508,000-acre LSR. Fuel reduction activities are proposed on 427 acres over the course of 1 year. The proposed treatment includes construction of shaded fuel

breaks following criteria identified in the South Cascades LSRA, which states that treatments will remove overstory trees to eliminate interlacing crowns and thin understory trees to a spacing of six feet or more between crowns. Trees 20" DBH and larger will be retained and generated fuels will be piled and burned or masticated. The silvicultural prescription retains snags and down wood at levels consistent with the LSRA while still maintaining the integrity of the fuel break. Treatments will occur along existing roadways and wildland urban interface (WUI) boundaries. Roadside treatments will occur within 45 feet of road edges with no heavy equipment permitted to leave roadways. WUI treatments will be 150 feet in width, consist of non-commercial thinning only, and not utilize heavy equipment.

As documented by the Forest, "The purpose of this project is to reduce fuels along strategic roadsides and wildland urban interface boundaries. This project will implement the Willamette National Forest wildfire risk management strategy by creating potential control locations (PCLs) within the Larison Potential Operational Delineation (POD). These PCLs will be used to assist in managing future fires on the district and allow for safer and more effective suppression responses to wildfires threatening adjacent communities, large blocks of late-successional forest, and other resources." In addition, according to the Forest, "The need for action is evident based on current fuel conditions within the project area and the resources at risk from large-scale wildfire. The Larison POD is considered a high risk fireshed due to high fuel loading, limited road access, susceptibility to multiple ignition types, and proximity to the communities of Oakridge and Westfir. The area has received multiple lightning starts in recent years and is also susceptible to human caused ignitions because of high levels of recreational use. Large wildfires near the Larison POD in 2014 and 2021 provide examples of the risk of large-scale disturbance and the potential for loss of late-successional forest in the area. Increasingly frequent drought conditions exacerbate the risk posed by high fuel loading." During the 2014 and 2021 fires, a total of 42 acres of fuel breaks were constructed during emergency fire suppression operations.

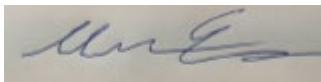
The project proposes 427 acres of fuel reduction within the South Cascades Late Successional Reserve (LSR 222). The 1998 REO review of the South Cascades Late Successional Reserve Assessment (LSRA) concluded that the risk reduction activities described in the LSRA are consistent with the Northwest Forest Plan Standards and Guidelines and are exempted from further REO review. Although the treatments proposed by this project are consistent with the criteria and objectives in the LSRA, the Middle Fork Ranger District seeks a consistency review to implement treatments at a rate beyond what the South Cascades LSRA identified in the implementation schedule for fuel break treatments.

The LSRA exempted 180 acres of fuel break treatments per year for the Willamette National Forest, with a maximum of 3,600 acres of fuel break treatments within the 93,000 acres of LSR (South Cascades LSRA, p. 158). The Forest is correct in that the South Cascades LSRA did not articulate whether the five year time period ran consecutively, although that would be a logical assumption. Regardless, given that the proposed 427 acres along with the previous 42 acres only represents 13% of the total treatment acres allowed within a 5-year period, the impacts fall well within those anticipated by the LSRA.

Review of the Project: The Larison POD Project was presented to the LSR work group on July 13, 2023, and a draft of the consistency document was sent to the work group to be reviewed on August 1, 2023. No additional comments from the work group were received.

The interagency LSR Work Group review concluded that the proposed treatment is consistent with the South Cascades LSRA and that implementing 427 acres of fuel breaks within one year meets the objectives of the LSRA, especially given that so few acres have been treated since 1998.

Conclusion: Based on the interagency REO LSR Work Group's review of relevant documentation, the REO concurs with the Forest's conclusion that the Larison POD Project is consistent with the Northwest Forest Plan.

A handwritten signature in blue ink, appearing to read 'M. Ehrman', is shown on a light-colored rectangular background.

MATTHEW EHRMAN
Regional Ecosystem Office

cc: Joshua Miller, Cameron Mitchell, Leslie Elliot, Matthew Pederson, James Rudisill, Debbie Anderson