## Regional Interagency Executive Committee 1220 SW 3rd Avenue

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## Memorandum

**Date:** June 12, 2020

**To:** Molly Juillerat, District Ranger, Middle Fork RD

From: Matt Ehrman, Regional Ecosystem Office Representative to the Regional

**Interagency Executive Committee** 

Subject: Regional Ecosystem Office/Late-Successional Reserve Work Group Review of the

Lowell Country, Willamette National Forest

**Summary**: The Regional Ecosystem Office (REO) Interagency Late-Successional Reserve (LSR) Workgroup as concluded its review of the information provided by the Willamette National Forest regarding the proposed Lowell Country Project (Project). The REO, based upon the review of the LSR workgroup in 2020 concurs with the Forest's findings that the proposed Project's actions meets the objectives of the Northwest Forest Plan (NWFP) Standards and Guidelines (S&G's) for LSRs.

**Basis for the Review**: Silvicultural actions are to be reviewed by the REO to ensure that the treatments are beneficial to the creation of late-successional forest conditions which serve as habitat for late-successional and old-growth related species including the northern spotted owl 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 Fall Creek LSR in 1996. The Fall Creek LSR was also included in the Mid-Willamette LSR in 1998. The REO's review of the Fall Creek and Mid-Willamette LSRAs concluded that the silvicultural activities described within the LSRAs are consistent with criteria and therefore are exempted from subsequent project level REO reviews. The REO stated in their review of the Fall Creek LSRA that "supplemental information concerning snag and coarse woody debris (CWD), provides a sufficient framework and context for future projects and activities within the LSR."

**Background and Project Description**: The purpose of the Lowell Country Project is to expedite development of late-successional stand characteristics in the Lowell Country project area. The silviculture treatments in the Late-Successional Reserve (LSR) portion of the Lowell Country project are designed to accelerate managed stands less than 80 years old toward late-successional forest characteristics that

include the development of large trees, multi-storied canopies, and provide for large snags and down wood. Due to the high productivity of this area, approximately 50% of the stands proposed for thinning have a high proportion of trees greater than 20" DBH, yet are still dense, single-story, homogeneous stands with limited understory development. Current thinning practices in LSRs (under 20 inches and thin from below) would not be sufficient in lowering tree density to meet desired stand and landscape objectives. Variable density thinning and harvesting trees up to 30" DBH in these stands would decrease the amount of time needed to attain late-successional characteristics and is consistent with the intent of the NWFP Standards and Guidelines for Late-Successional Reserves.

The Lowell Country Project area is located in the 125,000-acre Fall Creek fifth-field watershed, approximately 13 miles northeast of Lowell, Oregon on the Middle Fork Ranger District of the Willamette National Forest (see figure 1). The total project area is about 98,000 acres with 45,543 acres within the Fall Creek LSR 219.

This is a large-scale environmental assessment (EA) covering 19,011 acres of commercial thinning managed stands less than 80 years old. Given the amount of area covered by the analysis, the project is divided into seven phases each covering different geographic parts of the project area. Each phase is expected to thin approximately 3,000 acres, with a decision notice (and objection period) prepared after conducting surveys each year for approximately seven years. This will result in seven separate decision notices, one for each phase analyzed in the EA. The final EA was completed in 2019 and a decision notice for Phases I and II have been signed. Phase I was exclusively within the matrix land allocation, Phases II-V are within LSR 219.

The EA analyzed for the expected range of conditions found throughout all phases, acknowledging that site specific surveys would be completed by phase. The silviculture analysis stated that due to the high productivity of this area and fast-growing trees, there may be some stands where harvesting trees exceeding 20" DBH would be warranted to achieve the desired effects on stand structure and species diversity for LSR objectives. The EA specifically stated that should this be needed, a project-level consistency review by the Regional Ecosystem Office would be conducted and would be disclosed in the decision notice for that phase (USDA 2019, p. 58).

Of the 19,011 acres proposed for thinning, 9,762 acres (51%) occur within the Fall Creek LSR. The silviculture prescription is to harvest trees over 20" DBH in a subset of those stands located in phases II, III, IV and V. Stand exam data will be collected and analyzed for each phase. Stand metrics and conditions would be means for determining if the 20" DBH cut diameter limit would be exceeded in future phases.

Silvicultural treatments proposed for stands less than 80 years old in the Lowell Country project are consistent with pertinent S&Gs in the ROD (C-12), are with the LSRA treatment criteria for density management in stands less than 80 years of age, and are consistent with the existing review exemption criteria (REO Memorandum #694 dated July 9, 1996 and REO Memorandum #801 dated September 30) across 9,762 acres of thinning. The harvest of trees greater than 20 inches dbh is not consistent with REO Memorandum's 694 and 801. However, harvest of these trees is being proposed to benefit the creation of late-successional forest conditions which serve as habitat for late-successional and old-growth related species including the northern spotted owl. The LSR work group concurs that the harvest of these trees through thinning meets the objectives for LSRs around silvicultural treatments on pages C-12.

**Review of the Project**: A draft Lowell Country project consistency document was reviewed by the LSR workgroup in April of 2020 with comments returned to the forest that same month. The final consistency document was sent to the LSR workgroup to be reviewed on May 5, 2020. As stated above, the project meets the objectives for LSRs because the proposed removal of trees over 20" DBH would contribute to

achieving desired stand structure and species diversity in the LSR in highly productive, fast-growing forests in the project area.

**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.

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cc:

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