USDA United States Department of Agriculture | Forest Service | Rogue River-Siskiyou National Forest | 3040 Biddle Road Medford, OR 97504 541-618-2200

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Dear interested citizens,

I would like to know your concerns, questions, and suggestions regarding a project proposal to harvest fire-killed trees in the 2017 Chetco Bar fire area. The intent of this project is to recover marketable value in fire-killed trees within matrix allocated lands before they become unsuitable for processing by local mills. I am inviting your comments on the Chetco Fire Salvage project. Your comments will help us identify issues to be considered during the review of this proposed action.

Context of Proposal

The Chetco Bar fire was started by a lightning strike in the Kalmiopsis wilderness near the Chetco River; the fire was reported on July 12, 2017. The Chetco Bar fire spanned two districts on the Rogue River-Siskiyou National Forest (RRSNF). The Chetco Bar fire burned approximately 191,197 acres; approximately 170,321 acres were on National Forest System (NFS) lands. The Chetco Bar fire burned roughly 15% of lands designated as matrix within the fire perimeter. Approximately 85% of the fire on NFS lands occurred within lands where management allocations (such as congressionally reserved areas, late successional reserve (LSR), and riparian reserve) either prohibit post-fire salvage or are required to show ecological beneficial effects of treatments to aid in post-fire ecosystem recovery. The Northwest Forest Plan recognizes the role that natural disturbances play in creating tree defects favorable to wildlife. For example, LSR standards and guidelines outline the need to retain fire-damaged large trees; these trees serve as a key habitat element for wildlife.

In mid-November 2017, the Regional Forester for Region 6 approved the recommendations outlined in the RRSNF Rapid Assessment Team (RAT) report. The RAT report recommends a course of action for addressing the multiple large fires that occurred on the RRSNF during the 2017 fire season. Information guiding recommendations put forth in the RAT report were developed from multiple Burned Area Evaluation Reports (BAER), presentations, and discussions amongst the RRSNF and Region 6 Regional Office team. The RAT report identified treatments needed to address immediate threats to public safety, values at risk, and resource damage.

Along with the recommendation to salvage fire-killed trees in matrix from the Chetco Bar fire, additional recommended courses of action are to: implement BAER activities for each fire (each major fire that occurred on the RRSNF during the summer of 2017 has a BAER course of action tailored to the resource needs for the specific fire)[1]; address hazard and danger trees along roads and recreation areas; and pursue post-fire reforestation, restoration and planting opportunities.

[1]BAER activities cover actions such as road stabilization, culvert armoring and replacement, and unstable stream crossing removal. Additional BAER treatments likely include culvert replacement, weed spraying, road storm proofing, trail stabilization and hazard abatement.

Within the Chetco Bar fire perimeter approximately 25,386 acres of lands designated as matrix burned, of which approximately 13,626 acres incurred 50-100% canopy cover loss (forest overstory mortality). Given this scale of the fire-killed trees in the Chetco Bar fire, this proposal requires prioritization of where to focus post-fire salvage efforts. Areas within matrix need to be prioritized for addressing the large amounts of smaller diameter fire-killed trees. The proposed action would need to move forward quickly in order to capture some measure of timber value. According to the forest plans (see Purpose and Need section), matrix lands are where the majority of timber harvest should occur. Focusing on matrix lands helps narrow the scope of proposed actions.

This proposal focuses on salvage within the 13,626 acres of matrix that incurred 50-100% canopy cover loss. In areas where canopy cover loss ranged from 0-50%, the fire effects to the forest ecosystem are often beneficial. The fire effects in these areas are generally described as low severity fires. The effects to the forest include: increased light and available nutrients for early-seral and fire-adapted species, reduction of understory and midstory fuels, conditions that are conducive to development of complex forest structures and diverse species composition due to reductions in stand density and creation of small openings, and improved wildlife habitats for many species.

Salvage in these low severity burned areas is not part of this proposal. Within matrix burned areas with 50-100% canopy loss, the treatment acreage would be reduced due to a combination of factors. Factors that further reduce acres treated include: removing inventoried roadless areas, leaving non-merchantable trees species or size classes, locating and avoiding unmapped riparian reserve areas, determining operability and accessibility via limited road access for harvesting of timber, and considerations for post-fire wildlife habitat. Focusing the salvage efforts to suitable and operationally achievable area and timeframe, while also protecting other resource values is consistent with the direction recommended in the RAT report.

Project Area Location

The Chetco Fire Salvage project (see attachment 1) will evaluate 13,626 acres for feasibility of treatment in Curry County, Oregon. The project area is contained to parts of the Chetco and Pistol River 5th field watersheds. Elevations in the project area range from 200 feet to 3,500 feet. There are many streams within the project planning area. Chetco River bisects the project area. There are many recreation opportunities within the project area, including non-motorized trails, and both dispersed and developed recreation camping opportunities. There are many opportunities for hunting and fishing within the project area.

Purpose and Need for Proposal

The purpose of the Chetco Bar Fire Salvage project is to capture timber value in the matrix land allocations by harvesting dead, dying and/or damaged trees resulting from the 2017 Chetco Bar fire. There is a need to harvest dead and/or dying timber and reforest in a manner that meets objectives of the Siskiyou National Forest Land and Resource Management Plan (LRMP), as amended by the Northwest Forest Plan. The purpose and need in the Northwest Forest Plan states that the Forests covered under this Plan are to maintain a sustainable supply of timber and other forest products that will help maintain the stability of local and regional economies on a predictable and long-term basis (Northwest Forest Plan 1-4). The standards and guidelines for the Northwest Forest Plan provide for the majority of timber harvest and other silvicultural

activities to be conducted in portions of matrix with suitable forest lands. Most scheduled timber harvest takes place in the matrix (Record of Decision for the Northwest Forest Plan C-39).

Project Design and Proposed Action

The proposed action is to address timber salvage in **ONLY** matrix. Matrix is designated by the Northwest Forest Plan. Matrix overlays LRMP designated management area of partial retention visual, retention visual and general forest within the matrix allocation. Focusing treatment within matrix allocated lands and severity of fire narrowed down the scope of the proposal. The Chetco Bar fire burned at various intensities, affecting overstory tree mortality. Stands within the fire area were classified according to overstory burn intensity, see table 1.

Table 1. Overstory canopy cover loss from RAVG[1] remote sensing data

	Matrix lands only		Chetco Bar Fire total	
Canopy Cover Loss	**Acres**	**Percentage**	**Acres**	**Percentage**
0-25%	4,744	19%	60,649	32%
25-50%	7,016	28%	39,431	21%
50-75%	3,933	15%	30,596	16%
75-100%	9,693	38%	60,522	32%
total	25,386		191,197	

[1]Rapid Assessment of Vegetation Condition after Wildfire (RAVG), uses remote sensing, Landsat data to assess loss of forest cover from wildfire. This table displays loss of forest canopy cover.

Following standards and guidelines outlined in the Northwest Forest Plan and the LRMP, the Chetco Fire Salvage project proposes harvesting fire-killed trees of all size classes from lands designated as matrix that experienced moderate to high intensity burns. This project would salvage fire-killed or dying trees to provide timber to local mills and economies. Dead or dying trees would be salvaged in areas where operations are economically feasible and would consider potential impacts to sensitive resources and values. The timber value would be prioritized and captured using a salvage prescription as determined by a certified silviculturist.

Harvesting of the fire-killed trees would be conducted through a variety of harvest techniques, including:

- Mechanized harvesting on gentle or moderate slopes, and hand-felling of trees on steep slopes.
- Ground-based skidding on gentle or moderate slopes.
- Skyline (cable) yarding on steep slopes.
- Helicopter logging in areas with no road access.
    - Construction of helicopter landings.
- Reuse of existing road templates for temporary roads.
- Construction of short, new temporary roads, when resource values have been considered or impacts mitigated.

No permanent roads would be constructed with this project. No activities or harvesting of trees would occur in any inventoried roadless areas. Associated activities would include:

- Road reconstruction on the existing transportation network, including activities like culvert replacement, surface rock replacement, fill repair, stabilization, bridgework, and infrastructure repair.

- Road maintenance activities on existing transportation network to facilitate logging operations, including (but not limited to) activities like roadside brushing, grading, and ditch cleaning.
- Erosion control measures to mitigate erosion that may result from operations.
- Felling of non-merchantable species or smaller size classes for site preparation for planting or fuel reduction.
- Fuel reduction and disposal of slash. This may include machine piling, hand-piling, lop and scatter, chipping, mastication, and pile burning.
- Pre and post-harvest invasive species control.
- Post-harvest regeneration surveys, site preparation, and tree planting. Species that may be planted include Douglas-fir, white pine blister rust resistant stock of western white pine and sugar pine, disease resistant stock of Port-Orford-cedar, and other species as appropriate. Replanting of trees would occur within salvage units with insufficient seed sources to ensure natural regeneration in a timely manner.

Existing Condition Leading to Need for Action

In summer of 2017 approximately 191,197 acres burned in the Chetco Bar Fire. Approximately 25,386 acres burned within areas designated as matrix. Within the matrix, 53% (13,626 acres) burned in moderate to high severity, meaning most if not all of the trees are now fire-killed. Large areas of high severity fire effects exist, with no overstory trees alive. A large portion of the 13,626 acres were considered stand replacement. There are large amounts of standing dead trees, with little to no live trees left to contribute forest cover. Timber within this area was schedule to be harvested over the next 5 to 20 years.

A large proportion of the forests in the proposed action area are composed of small diameter trees (less than 20 inches in diameter). Smaller diameter fire-killed trees lose their value rapidly to insect, pathogens, and the natural deteriorating processes, which would result in little to no economic value to recover. It is important to move quickly in order to capture the value of this timber and to re-establish the next forest.

Most of the high severity burned areas in matrix are in mixed hardwood/conifer stands, with high composition of tanoak. While we expect natural regeneration of mixed species in most areas, some large areas have no remaining live conifer (mostly Douglas-fir) seed source available within seed dispersal distances. Hardwoods that regenerate through sprouting like tanoak, Pacific madrone, alder, and big leaf maple are already sprouting. Without planting of conifer species, large areas could potentially convert from mixed hardwood/conifer stands to hardwood (tanoak) stands.

Desired Condition

The LRMP identifies the intent to obtain a full yield of timber within the capability of the land (page IV-139) as a Goal for the Forest. The Record of Decision (ROD) for the LRMP states that the Forest-wide goal is to "Provide a balance of resource management that will maintain a healthy Forest ecosystem, and help to supply local, regional and National social economic needs" (LRMP ROD page 10) and identifies salvage as an acceptable method for timber harvest (LRMP ROD page 21). Standards and guidelines in the Northwest Forest Plan states objectives for each allocation. Matrix objectives for management after stand-replacing events generally differ from those for Late-Successional Reserves. In matrix, economic benefits of timber

production receive greater consideration. For example, the commercial salvage of dead trees will be less constrained, and replanting disturbed areas will be a high priority (Northwest Forest Plan ROD B-9).

The management objectives of matrix points to the need of harvesting timber; subsequently, it is important to salvage timber and reset the timber production for future harvest opportunities. This timber would be harvested, capturing the economic value that was intended to be sustainably and evenly harvested over time.

Timber harvest could generate revenue for post-fire recovery and restoration such as tree planting. Getting the next cohort of forest growing quickly is important to contribute to future timber production, developing wildlife habitats, and creating resilient forest conditions. Planting is critical for meeting the objective of re-establishing the forest with coniferous components in burned stands that cannot naturally regenerate conifers. Without planting, large areas could potentially convert from mixed hardwood/conifer stands to hardwood (tanoak) stands. An exotic pathogen, sudden oak death (SOD), is present within the fire area and is very effective at killing tanoak. This is a serious concern for the future forests of this area; planting conifers would be important strategy to promote diversity of tree species in the possible scenario that SOD becomes widespread in the Chetco drainage.

Decision to be Made

As the Forest Supervisor for the Rogue River-Siskiyou National Forest, I am the responsible official for this decision. The decision I will make will consider whether to implement the proposed action, or another action alternative, and if so, under what conditions. My decision will be based on the results of the analysis by the Forest Service interdisciplinary team (team) and any public comments received.

As the team complete their evaluation of the project, stand-specific design features will be developed as needed to protect resources in the vicinity. These design features are based on LRMP and Northwest Forest Plan direction, best available science, past experience with fire salvage, and site-specific evaluations. Design features include the implementation of best management practices and mitigation measures and are designed to minimize effects of management activities on natural resources. I expect the team to incorporate these protective elements into the project design. The is working with the U.S. Fish and Wildlife to determine what effects, if any, the project would have on northern spotted owl and marbled murrelet. The team includes a member from U.S. Fish and Wildlife. The Forest is working with the National Marine Fisheries Service to determine what effects, if any, the project would have on southern Oregon/Northern California coast Coho salmon.

Rapid implementation is essential for meeting the purpose and need of the proposed action. Therefore, following direction put forth in 36 CFR 218.21, I intend to submit my request for an emergency situation determination (ESD) to the Chief of the Forest Service. Communities adjacent to the fire were affected by the fire; by allowing for harvest of fire-killed trees, the local mills would recover economic value from wood products.

The Forest recognizes that a short operating window, unknown weather variables, and further wood deterioration would reduce the likelihood of successfully selling and removing wood products in the timeframe needed to avoid a loss of commodity value. An ESD is needed to act before the progressive loss of timber commodity value due to timber deterioration makes salvage

uneconomical and unbeneficial. Continued deterioration has the potential to reduce the Forest Service's ability to accomplish objectives directly related to funding resource restoration. The goal of the ESD to facilitate timely implementation of the proposed action during the 2018 field season. Only the Chief and Associate Chief of the Forest Service may grant an ESD.

If an ESD is determined valid and warranted, the proposed action will be exempt from the objection process. This exemption allows us to implement the proposed action as soon as the environmental analysis is completed and the decision is signed. Rapid implementation following the environmental review would allow us to capture enough commodity value of the trees and in turn, re-establish the forest. If stands are not salvaged and material proposed for removal cannot be sold, some of these stands may not be suitable for future timber production, produce suitable owl habitat, or would not be resilient to non-native pathogens such as SOD. Additionally, increased fuel loading would likely occur within untreated units.

Even if an ESD is granted, many opportunities for the public to be involved in the planning process are available, including responding to this proposed action and throughout the development of the project, and commenting on the environmental analysis.

Public Participation

I recognize the many interests and concerns the public has regarding the salvage of timber on National Forest lands, and that is why I am requesting your comments concerning the Chetco Fire Salvage project. Your comments and feedback will help provide valuable information to the interdisciplinary team (the team) and can help identify additional issues and opportunities not previously identified.

Scoping comments will be accepted throughout the environmental analysis, but your scoping comments will be most useful if they are submitted by January 31, 2018. Comments after that date will be accepted, but your comment may not be able to inform our analysis and our ability to respond effectively could be reduced. More information and PDF versions of maps are available on the project website at: https://www.fs.usda.gov/project/?project=53150

An interdisciplinary team has been identified and an analysis is underway to examine this project area for opportunities to harvest dead and/or dying timber in a manner that is consistent with the LMRP and the Northwest Forest Plan. The team's analysis is focused on these desired conditions and a decision is scheduled for May 2018.

Comments may be submitted in writing or through electronic means. Those who respond to this invitation for comments will be notified when the draft environmental assessment is advertised for a thirty day public comment period.

Please address written comments to:

Jessie Berner, Chetco Fire Salvage Coordinator
Gold Beach Ranger District
29279 Ellensburg Ave.
Gold Beach, OR 97444

Electronic comments may be submitted to: comments-pacificnorthwest-siskiyou-goldbeach@fs.fed.us. The subject line must contain the name of the project for which you are submitting comments (i.e., Chetco Fire Salvage project). Acceptable formats for electronic comments are Microsoft Word, Word Perfect, or RTF. Your scoping comments, including names

and addresses, will become part of the public project record. Information submitted anonymously will be accepted and considered; however, anonymous feedback will not provide us with the ability to provide the respondent with subsequent environmental documents.

For more information on the Chetco Bar Project or the NEPA process, contact Chetco Bar IDT Lead, Lori Bailey, at labailey@fs.fed.us.

Thank you for your interest in this project.

Sincerely,

ROBERT G. MACWHORTER
Forest Supervisor

Enclosures: Attachment 1 consisting of 2 pages