



File Code: 1950
Date: March 22, 2011

Dear Interested Party,

The Barlow Ranger District on the Mt. Hood National Forest has identified you as an individual, agency, or organization that might be interested in commenting on our The Dalles Watershed Phase II proposal to reduce hazardous fuels and restore hydrologic conditions on approximately 3,660 acres within the interior of The Dalles Municipal Watershed (see attached Vicinity Map). The Dalles Municipal Watershed is listed as a community at risk (Mill Creek) in the Federal Register (Vol. 66, No. 160, 2001) and a high priority for treatment within the Wasco County, Wildfire Community Protection Plan.

The Dalles Municipal Watershed is the primary water supply for the City of The Dalles, Oregon serving 12,000 residents. Over 95 percent of the City water supply is obtained from the watershed. The watershed is closed to public access, only allowing minimal public and administrative use. Over the past 25 years, there have been only three ignitions within the watershed. The majority of fires in close proximity to the watershed have been human-caused and have occurred near roads outside the protection boundary of the watershed.

Background

In February 2004, the City of The Dalles requested the Forest Service take action to improve and protect forest health on federally managed public lands within and adjacent to The Dalles Municipal Watershed. Under the authorities of the Healthy Forest Restoration Act (HFRA), the Hood River and Barlow Ranger Districts convened a collaborative working group to assist with developing recommended actions for the South and North Fork Mill Creek planning areas. Barlow Ranger District currently is implementing the first phase of the recommendations for South Fork Mill Creek with The Dalles Watershed Fuelbreak, which focuses on reducing fuel loadings and reducing tree density to provide for better protection along the perimeter of, and along roads within, this municipal watershed. Also, Hood River Ranger District is implementing the recommendations for North Fork Mill Creek, which reinforces fuel reduction efforts occurring with The Dalles Watershed Fuel Break along with other restoration projects.

In October 2010, the Mill Creek Collaborative Group re-convened to begin developing recommendations for the interior of The Dalles Municipal Watershed. Through a series of field trips as well as office meetings, the group developed a second set of recommendations for South Fork Mill Creek (available at <http://www.fs.usda.gov/goto/mthood/projects>). The recommended treatments are designed to meet the objectives of improving hydrologic conditions, providing for a more fire resistant stand, and improving forest health. The Dalles Watershed Phase II (Barlow Ranger District) would implement many of the collaborative group recommendations brought forth by the Mill Creek Collaborative group while reinforcing the fuel reduction efforts from the previous projects.

Collaborative representatives met from October to December 2010. The community collaborative group was composed of representatives from: federal and state agencies (Forest Service, Oregon Department of Forestry, Oregon Department of Environmental Quality), watershed councils and local agencies (Mill Creek Watershed Group, Wasco County Soil and Water Conservation District, Hood River Soil & Water Conservation District, Hood River Watershed Group, City of The Dalles), environmental groups (Bark and Oregon Wild), non-governmental organizations (Rocky Mountain Elk Foundation, Backcountry Horsemen of Oregon), timber industry, private citizens, and neighboring landowners. The collaborative group recommended developing fuels treatments that would restore forest stand health and allow for fire



to play a more natural role. After receiving the recommendations, District personnel began the interdisciplinary process of developing a detailed fuels reduction and restoration proposal that would meet the objectives for the area and respond to many of the recommendations of the collaborative group.

Purpose and Need

The overall purpose of this proposal is to reduce hazardous fuels within the City of The Dalles Municipal Watershed. The proposed activities would reduce the risk of an uncharacteristically severe wildfire, improve wildfire protection of the municipal watershed, and move the landscape toward more historic conditions. The current condition of the area is characterized by forests of ponderosa pine/Douglas-fir and Douglas-fir/grand fir forest types with a vegetative composition and fuels profile that have moved away from the historic condition. The overall stand structure has changed from a primarily open late successional, single-storied forest pattern, to one that is predominantly a closed multi-storied forest. These stands are also at a much higher density, which puts them at risk of uncharacteristic mortality of large trees and at risk of uncharacteristic fires and/or insect and disease outbreaks.

The need for this project was first identified by The City of The Dalles based on the concern of future fires and their effect on water quality. A Memorandum of Understanding (MOU) exists between the city and the Mt Hood National Forest, detailing the relationship between the City and the Forest Service on National Forest System lands. The primary purpose of the request from the City of The Dalles is to reduce the risk to water quality from catastrophic wildfire and to restore watershed conditions on the National Forest System lands as well as the City owned in-holdings. The principal use of this watershed is as a municipal water supply. The basic objective for managing this watershed is to maintain or restore the present quality and quantity of water received from the major subdrainages. Water quality will take priority over water quantity in management decisions (MOU for The Dalles Municipal Watershed, 1972).

In order to meet these purposes, the underlying needs for this project are for:

- Changing existing fire condition class and moving younger stands toward a more historic condition;
- Reducing the risk of large stand replacing events in the watershed using management strategies such as prescribed burning, masticating of underbrush, reducing down woody fuels, and thinning overstory and understory trees (thinning from below);
- Reducing hazardous fuel loadings and fuel ladders (small reproduction that increases potential for crown fire initiation) to reduce the risk of unwanted effects of wildfire on National Forest System lands and City of The Dalles in-holdings within the municipal watershed; and,
- Restoring watershed conditions within the City of The Dalles Watershed within the National Forest boundary.

Land Use Allocations

The desired future condition of the project is to develop an open multi-story (uneven-aged) stand with canopy closure that would allow fire behavior to be predominately surface fire, and to have stand species composition reflecting Condition Class 1 (ponderosa pine, western larch, white oak, and dry-climate Douglas-fir dominated vegetation). This condition class represents a more natural condition for this area. Achieving this desired future condition would enable meeting the overall goals of the land allocations within the project area.

Several land allocations for National Forest System lands as designated by the Mt. Hood National Forest Land and Resource Management Plan (Forest Plan) and Northwest Forest Plan are found within the project area. The three major Forest Plan land allocations in the planning area are Special Emphasis Watershed (B6), Research Natural Area (A3) and Pileated Woodpecker/Pine Marten Habitat Area (B5).

The majority of the project area is within *B6-Special Emphasis Watershed* land use allocation, as described by the Forest Plan (pages 4-246 thru 4-247). The goal for this land use allocation is to maintain

or restore watershed, riparian and aquatic habitat conditions and water quality for municipal uses and/or long term fish production. A secondary goal is to maintain a healthy forest condition. The major characteristics for the land use allocation that this project would help to achieve include: Extensive stands of trees at various stages of development, arranged in a mosaic pattern, influenced by drainage patterns, geology, soils, and avoidance of sensitive watershed lands are prevalent; and, Riparian areas approximate natural conditions.

The smaller portion of the project area is within *A3-Research Natural Area*, as described by the Forest Plan (pages 4-145 thru 4-146). The goal for this land use allocation is to preserve examples of natural ecosystems in an unmodified condition for research and education, and to provide areas to serve as a baseline against which human impacts on natural systems can be measured. Lastly, the project area is within some *B5-Pine Marten Habitat Area*, as described by the Forest Plan (pages 4-240 thru 4-241). The goal for this land use allocation is to provide Forestwide mature or old growth forest habitat blocks of sufficient quality, quantity and distribution to sustain viable populations of pileated woodpecker and pine marten. A secondary goal is to maintain a healthy forest condition through a variety of timber management practices.

The Northwest Forest Plan land use allocations overlap allocations within the Forest Plan. This planning area includes Riparian Reserve, Tier 1 Key Watershed, and matrix. Treatments would be located within each of these land use allocations. Riparian Reserve includes areas along rivers, streams, wetlands, ponds, lakes, and unstable or potentially unstable areas where the conservation of aquatic and riparian-dependent terrestrial resources receives primary emphasis. All of the National Forest portions of the project area are located within Tier 1 Key Watershed – a component of the Aquatic Conservation Strategy. These watersheds were designated as sources for high water quality; they contain at-risk anadromous salmonids, bull trout, and resident fish species (none of these fish are found in the portion of the watershed within the planning area). The planning area is within the Mill Creek Watershed. Matrix consists of Forest Service lands outside of designated areas (i.e., Congressionally Reserved Areas, Late-Successional Reserves, Adaptive Management Areas, Administratively Withdrawn Areas, and Riparian Reserves). Most timber harvest and other silvicultural activities are conducted in portions of matrix with suitable forest lands.

Proposed Action

The Barlow Ranger District proposes to treat approximately 3,660 acres. The purpose of all the activities is to reduce hazardous fuels and restore hydrologic conditions. The mechanical fuels reduction treatment methods would consist of tree thinning including the sale of vegetative material, machine piling of woody material, hand thinning, and mechanical fuels reduction. Prescribed burning (underburning) would be used in combination with mechanical treatments or with limited non-mechanized (hand falling) treatments to restore stand health and to create conditions whereby fire could function in a more natural role. The intent is to move this area more toward the desired future condition described above. After all treatments are completed, the goal is to have 10 tons of fuels per acre or less remaining on the ground in order to meet the purpose and need for action for this project.

The proposed treatments for the planning area are shown in the table below. All proposed treatment areas are shown on the Proposed Action map, and include riparian buffers and buffers around known Northern Spotted Owl nesting sites. The Proposed Action map is available on-line at:

<http://www.fs.usda.gov/goto/mthood/projects>.¹

Treatment	Acres
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¹ If you do not have access to the internet or would like a hard copy of the Proposed Action map mailed to you, please contact Jennie O'Connor Card at (541) 352-1255 or jennieoconnorcard@fs.fed.us.

Fuels Reduction Thinning (natural stands)	1352
Fuels Reduction Thinning (plantations)	107
Sapling Thin	435
Jackpot Burning	742
Prescribed Burning on City of The Dalles Lands	872
Mechanical Fuels Reduction	151
Total Acres	3660

Fuels reduction thinning treatment within the natural stands include prescriptions to thin ponderosa pine and Douglas-fir dominated stands (both commercial and non-commercial material) to an average canopy closure of 40 to 60 percent on approximately 1,352 acres. Prescribed burning, pile burning, and/or mechanical fuels treatments would be applied to these treatment areas as well. Mechanical fuels treatments could include, but would not be limited to, grapple piling, lop and scattering, or masticating.

Plantation fuels reduction thinning on approximately 107 acres to an average canopy closure of 40 percent in ponderosa pine/Douglas-fir dry forest type and 50 percent in Douglas-fir/ponderosa pine and grand fir wet forest type to promote and develop more resilience stand conditions. Prescribed burning, pile burning, and/or mechanical fuels treatments would be applied to these treatment areas as well. Mechanical fuels treatments could include, but would not be limited to, lop and scattering, or masticating.

Sapling thinning with mechanical brush treatment on approximately 435 acres to approximately 60 to 100 trees per acre in ponderosa pine/Douglas-fir dry forest type and 100 to 200 trees per acre in Douglas-fir/ponderosa pine and grand fir wet forest type to promote and develop more resilience stand conditions. Brush treatments would be a mix of mechanical and hand treatments based on site conditions. Prescribed burning, pile burning, and/or mechanical fuels treatments would be applied to these treatment areas. Mechanical fuels treatments could include, but would not be limited to, lop and scattering, masticating, or biomass collection. Biomass collection would include machine piling and removal of materials to be used to generate electricity.

Approximately 742 acres are proposed for prescribed jackpot burning treatments in the Research Natural Area (RNA) outside of the above proposed thinning treatments and would likely be burned in conjunction with acres identified for burning within proposed treatment areas. Jackpot burning includes burning high concentrations of fuel loadings using prescribed burning. Roads and skid trails would be utilized first as control lines; however, some handline may need to be constructed in order to block up burn areas.

Mechanical fuels reduction treatment is a non-commercial thinning and mechanical brush treatment on approximately 151 acres to approximately 60 to 100 trees per acre in ponderosa pine/Douglas-fir dry forest type to promote and develop more resilience stand conditions. Brush treatments would be a mix of mechanical and hand treatments based on site conditions. Prescribed burning, pile burning, and/or mechanical fuels treatments would be applied to these treatment areas. Mechanical fuels treatments could include, but would not be limited to, lop and scattering, masticating, or biomass collection. Biomass collection would include machine piling and removal of materials to be used to generate electricity.

All thinning activities proposed in this project would apply variable density thinning (VDT), which allows flexible local densities levels to achieve overall treatment objectives. This allows emphasis to be placed on leaving vigorous trees of all sizes without concern for spacing. Prescribed burning and/or mechanical fuels treatments in harvested stands would be applied when all thinning treatments have been completed. This is expected to be within five years of mechanized treatments. Post-activity assessments would be completed to determine specifically when and where prescribed fire would be applied.

In addition, The City of The Dalles has requested the assistance of the US Forest Service in prescribed burning the City owned lands (approximately 872 acres) in the municipal watershed and within the

boundaries of Mt. Hood National Forest. The prescribed burning of these private in-holdings would benefit the National Forest System lands by reducing the fuel loading within the watershed and moving the landscape to a more historical condition.

Mt. Hood Land and Resource Management Plan

Standards and guidelines in the Mt. Hood Forest Plan were not written to specifically address hazardous fuels reduction. When the Mt. Hood Forest Plan was written (1990), it emphasized traditional timber sales, and did not specifically address fuels reduction projects. It is anticipated that the following standards would not be fully met with this project.

- Organic Matter (FW-033): At least 15 tons per acre of dead and down woody material in eastside vegetation communities...should be maintained and evenly distributed across managed sites.
- Down Wood Material (FW-219): An average total of at least 6 logs per acre in decomposition classes 1, 2 and 3 should be retained in all project activity areas.
- Snags (FW-215): Where new timber harvest units occur, wildlife trees (i.e. snags and green reserve trees) should be maintained in sufficient quantity and quality to support over time at least 60 percent of the maximum biological potential of primary cavity nesting species.
- Silvicultural Systems (FW-333): Uneven-age management should not be applied on slopes where cable logging systems would be necessary (30+% slopes).
- Silvicultural Systems (FW-337). Uneven-aged management should not be applied where stands are moderately to heavily infected with dwarf mistletoe.

Based on a preliminary effects analysis conducted by the interdisciplinary team, exceptions to these standards would be needed to meet the purpose and need of effective fuel reduction within the planning area. These standards are in the “should” category (Forest Plan, page Four-45) and therefore exceptions are acceptable if 1) they are identified during interdisciplinary project planning environmental analyses and 2) are documented in environmental analysis documents.

Healthy Forest Restoration Act

The District is analyzing the proposed fuels reduction project in an Environmental Assessment (EA) under the authorities of the Healthy Forest Restoration Act (HFRA). HFRA was adopted by Congress to improve the capacity of agencies to implement hazardous fuels reduction projects that are aimed at protecting communities and watersheds from wildfire. To view the text of the HFRA, you can visit the following link: <http://fsweb.wo.fs.fed.us/hfra/references/hfra.pdf>. Also, detailed information on the implementation of HFRA projects can be found on the following website: <http://www.fs.fed.us/projects/hfi/field-guide/>.

The project, as proposed, fits within the parameters of an HFRA project, since it is within a municipal watershed and the treatments are proposed within Fire Regime Condition Class 3. Section 102(a)(2) Authorized Hazardous Fuels Reduction Projects states: “condition class 3 Federal land, in such proximity to a municipal water supply system or a stream feeding such a system within a municipal watershed that a significant risk exists that a fire disturbance event would have adverse effects on the water quality of the municipal water supply or the maintenance of the system, including a risk to water quality posed by erosion following such a fire disturbance event.” There are special requirements and exemptions in an EA prepared under the HFRA, such as analyzing a limited number of alternatives and a special administrative review called an objection process, rather than the traditional administrative appeals process. The requirements of the objection process are explained below.

Opportunity for Public Comment

Public participation is an important part of this analysis. The District is seeking information, comments, and assistance from Federal, State and local agencies, tribes, and other individuals or organizations that may be interested in or affected by the proposed action. We are interested in hearing your comments on these or any other issues you may have on this project. Your issues will be important to us as we develop any alternatives to the proposal, analyze the effects of the alternatives, and select a final course of action.

In addition, written comments must be received during this comment period to be eligible to file an objection during the pre-decisional, administrative review process (36 CFR 218). Comments must be specific and relate to the proposed action. They must be postmarked or received no later 30 days following the publication of the legal notice in *The Oregonian*. Please send written comments to:

Jennie O'Connor Card
Hood River Ranger District
6780 Highway 35
Mt. Hood/Parkdale, OR 97041.

Electronic comments should be submitted to comments-pacificnorthwest-mthood-barlow@fs.fed.us in a format such as an e-mail message, plain text (.txt), rich text format (.rtf), or Word (.doc).

There will be a public meeting on **April 6, 2011** at the Barlow Ranger District located at 780 NE Court Street, Dufur Oregon 97021 from 5:30-7:00 pm to discuss this proposal, provide maps and answer questions. It will also be a time for us to hear any concerns you may have for this proposal or its effects. Please contact us if you would like to attend, or need directions.

Timeline:

After comments are received during this comment period and are incorporated into the analysis, an EA is expected to be completed and the objection period is expected to begin in June 2011.

We look forward to your participation in this project.

Sincerely,

/s/ Michael J. Hernandez

Michael J. Hernandez
Barlow District Ranger

Enclosure