



File Code: 1950
Date: November 18 2022

To: 27 Road Fuel Break Interdisciplinary Team

Subject: 27 Road Fuel Break Project Initiation Letter (PIL)

This memo is to notify you of your participation on the interdisciplinary team (IDT) and communicates my intent to complete this project.

Purpose and Need

The primary purposes of this project are to reduce the risk of landscape level disturbance by establishing a linear fuel break along National Forest System (NFS) Roads 2700000 (27 Road), 2710000, 2720000, 2730000 and 4421000.

Draft Proposed Action

The proposed action will create a 1,000' fuel break along the 27 Road (approximately 2,800 acres total). Activities will be designed to be consistent with requirements of the Public Law No. 117-58, section 40806 (discussed below). Broadly, a combination of commercial thinning, non-commercial thinning, and fuels treatments will be used. The proposed action would not construct any system roads. Road maintenance would occur on all roads needed along a timber haul route. Temporary roads may be constructed.

See "Requirements for use of the Fuel Break CE" below.

Project design criteria will be developed by the IDT as part of the proposed action.

Background

In 2022, the Bipartisan Infrastructure Law established a new categorical exclusion (CE) for forest management activities with a primary purpose of establishing and maintaining linear fuel breaks up to 1,000 feet wide and on treatment areas up to 3,000 acres.

This CE authority is independent of the Healthy Forests Restoration Act (HFRA) and does not amend that Act. At this time the Bipartisan Infrastructure Law is not codified in USC yet and shall be cited as "Public Law No. 117-58, section 40806". This document refers to the CE as the "Fuel Break CE."

This CE differs from earlier, similar CEs. For example, the Wildfire Resilience CE is focused on methods that maximize the retention of old-growth and large trees, to the extent that the trees promote stands that are resilient to insects and disease, and reduce the risk or extent of, or increase the resilience to, wildfires.

Alternatively, the Fuel Breaks CE is focused on at-risk community protection through establishment of linear fuel breaks. Since the Fuel Breaks CE is used in conjunction with an existing linear feature, it approaches reducing fire risk from a slightly different emphasis than the Wildfire Resilience CE.

Requirements for use of the Fuel Break CE

General

This CE applies to the establishment and maintenance of linear fuel breaks which are:

- Up to 1,000 feet in width contiguous with or incorporating existing linear features, such as roads, water infrastructure, transmission and distribution lines, egress corridor, maintenance of existing fuel breaks and/or pipelines of any length on Federal land
- The fuel break must be located adjacent to or incorporating an existing linear feature, it cannot be established or unattached to a linear feature
- Intended to reduce the risk of uncharacteristic wildfire on Federal land or catastrophic wildfire for an adjacent at-risk community

Activities permitted

Mowing or masticating; thinning by manual and mechanical cutting (including commercial and/or non-commercial thinning); piling, yarding, and removal of slash or hazardous fuels; selling of vegetation products, including timber, firewood, biomass, slash, and fence posts; targeted grazing; application of pesticide, biopesticide or herbicide; seeding of native species; controlled burns and broadcast burning; and burning of piles, including jackpot piles.

Locations

Acres treated may not exceed 3,000 acres and shall be located primarily in:

- The wildland-urban interface (WUI) or a public drinking water source area.
- If located outside the wildland-urban interface or a public drinking water source area, an area within Condition Class 2 or 3 in Fire Regime Group I, II, or III that contains very high wildfire hazard potential, or
- an insect or disease area designated by the Secretary as of November 15, 2021.

Project activities may **not** occur in Wilderness, on Federal land on which the removal of vegetation is prohibited or restricted by Act of Congress, Presidential proclamation (including the or regulation; in a wilderness study area; or in an area in which carrying out the activity would be inconsistent with the applicable land management plan or resource management plan.

Roads

- Permanent roads: A project under this section shall not include the establishment of permanent roads.
- Existing roads: The Secretary concerned may carry out necessary maintenance and repairs on existing permanent roads
- Temporary roads: The Secretary concerned shall decommission any temporary road constructed under a project under this section not later than 3 years after the date on which the project is completed.

Collaboration

Projects using this CE must be prepared collaboratively among State and local governments and Indian Tribes and with participation of interested persons.

The entire project area is located in fire regime I or III. All mapped areas are classified as Fire Regime Condition Class 2 or 3. Additionally, the majority of the project is overlapped with identified WUI zones, as designated by the Wasco County Community Wildfire Protection Plan.

Project Location

The planning area is located along NFS Roads 270000, 2710000, 2720000, 2730000 and 4421000.. Data can be found at T:\FS\NFS\MtHood\Project\bar27RoadFuelsCE2023.

Mt. Hood National Forest Plan and Northwest Forest Plan

The planning area is made up of several Management Areas (land use allocations) which are described in detail in the Forest’s Land and Resource Management Plan (Forest Plan) as amended.

Table 1. Mt. Hood National Forest Plan Land Use Allocations in the 27 Road planning area.

Land Use Allocation	Approximate Acres in Planning Area (Percent)
B4	1,590 (57%)
C1	892 (32%)
C1/B5	16 (<1%)
B4/B5	274 (10%)
Total Planning Area Acres	2,772

The Northwest Forest Plan Land Use Allocations for the planning area are shown in Table 2 below.

Table 2. Northwest Forest Plan Land Use Allocations acres in the 27 Road planning area.

Land Use Allocation	Approximate Acres in Planning Area (Percent)
Riparian Reserves	434 (16%)
Late-successional Reserve (LSR)	588 (21%)
Late-successional Reserve (LSR4)	31 (1%)
Matrix	1,719 (62%)

Timeline and Collaboration

We will work with the Wasco County Forest Collaborative (WCFC) to develop the project. The timeline below estimates NEPA milestone deadlines. More details are forthcoming as the project develops.

If this timeline cannot be met, please notify me immediately to help evaluate delays and to develop a solution that meets timeframes and forest priorities.

Table 3. DRAFT Project timeline.

IDT Task/NEPA Milestone	Date
Field work and check-ins at regular IDT meetings and WCFC meetings	Spring-Summer 2023
Project presented to WCFC	May 2023
WCFC field trip	May 2023
WCFC develops input for proposed action and submits recommendations to Forest Service	June 2023
Review WCTC input, conduct preliminary effects analysis, finalize draft PDC and draft proposed action for scoping.	June 2023
30 day scoping comment period	July 2023
Focus Week: Review scoping comments, finalize PDC and specialist reports.	August 2023
Final DM Signed	September 2023

Interdisciplinary Team Roles and Responsibilities

I would like to highlight the importance of communication between each of us and the professional and timely input expected of you. I fully understand conflicts may arise related to timing and workload because our work is complex. There may be instances when we need to sit down with you and your supervisor and the IDT leader to renegotiate your workload, your priorities, or the timing of your input.

The IDT members for this project and the anticipated roles are outlined in the table below:

Table 4. Interdisciplinary team members.

Team Member	Responsibility
Ashley Popham	NEPA
Rick Lancaster	Fuels / Project Proponent
Andy Tierney	Logging Systems
Katie Santini	Wildlife
Todd Reinwald	Hydrology
David Watson	Soils
Kat Arendt/Laura Cowger	Fisheries
Christina Mead	Botany / Invasive Plants
Jon Breithaupt	Recreation
Morai Helfen	Visuals
Whitney Olsker	Silviculture
Josh Marxen	Engineering / Transportation
Bobby Saunters	Heritage and Tribal Engagement
Upekala Wijayratne	Climate Change
Emily Rush	GIS

Responsible Official

As the Barlow District Ranger, I am the responsible official for this project. If you have questions about the information provided in this project initiation letter please let me know as early as possible. I appreciate the work many of you have done to date on this project and thank you for your commitment and participation.

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SAM** Digitally signed by
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KAMERON C. SAM
Barlow District Ranger