



Wasco County **FOREST** Collaborative

Steering Committee Membership

*Antone Moody,
Confederated
Tribes of Warm
Springs*

*Kristin Dodd,
Oregon Department
of Forestry*

*Chase Brown,
Oregon Department
of Fish and Wildlife*

*Larry Magill,
Wamic Rural Fire
Protection District*

*Pat Davis, White
River Watershed
Council*

*Kathy Long,
Northern Oregon
Motorcycle and
ATV Club*

*Ryan Bessette,
Wasco County Soil
and Water
Conservation
District*

Jordan Latter, Bark

*Jon Paul Anderson,
WKO/High
Cascade Inc.*

*Rich Thurman,
Retired Wildlife
Biologist*

*John Nelson, School
District 21 Board
Member Liaison*

To: Kameron Sam, District Ranger

From: Wasco County Forest Collaborative Steering Committee

Date: July 31, 2025

Subject: Scoping Comments for Hootenanny Insect and Disease Project

Dear District Ranger Sam,

The Wasco County Forest Collaborative (WCFC) is pleased to submit our scoping comments for the Hootenanny Project. These comments build on the pre-scoping comments submitted in December 2024 and the collaborative project planning process. We appreciate the thoughtful engagement of Mt. Hood National Forest, Oregon Department of Forestry, and third-party NEPA contractor, WSP, throughout this process. The collaborative field tour in spring 2025 was especially informative.

Collaborative and Agency Partnerships

The Hootenanny Insect and Disease represents a new and creative approach to advancing forest health and wildfire risk reduction in partnership with the Oregon Department of Forestry (ODF) under the Good Neighbor Authority and Federal Forest Restoration Program. The increased investments by ODF in the Mt. Hood National Forest are a positive development that aligns with our collaborative's goals, and we are supportive of this project as a means to improve ecosystem resilience and forest health, economic development, and community wildfire protection.

Since the establishment of the Wasco County Forest Collaborative in 2015, we have worked with your staff to plan numerous forest management and restoration projects on the Barlow Ranger District. Through the hard work of your staff and collaborative members, our collective efforts created a pipeline of projects that enabled two successful Joint Chiefs Awards and the Wildfire Crisis Strategy Priority Landscape designation. This increased funding has been critical to implementing treatments and increasing staff capacity on the Mt Hood National Forest. In conjunction with the work on federal lands, our



Wasco County **FOREST** Collaborative

partners are also investing in fuels reduction on adjacent state and private lands and working with homeowners to create defensible space.

Collaborative Zones of Agreement – Hootenanny Insect and Disease Project

Building on our previous collaborative agreements, we would like to highlight several key areas of support and recommendations for the Hootenanny Project:

Design and Implement Effective and Strategic Mechanical Forest Health and Fuels Reduction Treatments

The forest health and fuels reduction treatments included in past collaborative projects were designed by Forest Service specialists with input from the public, our members, and science advisors to reduce risk of high-severity, uncharacteristic disturbance events. Climate change and increasing drought and wildfire risk pose significant threats to forests and communities.

Accelerating the planning and implementation of dry forest restoration through thinning and prescribed burning is critical to restoring ecosystem function and maintaining the benefits forests provide people and wildlife.

Wasco County Forest Collaborative members support utilizing the right treatment in the right place. Treatment activities include commercial thinning, non-commercial thinning, and prescribed burning. Fully implementing a range of treatments will be critical to reducing the risk of high severity wildfires and insect and disease outbreaks in the Hootenanny Project. There is scientific consensus that these treatments are necessary and effective to meet our ecological restoration goals in dry forest ecosystems. These treatments are especially effective once prescribed fire is utilized to further reduce surface fuels and restore fire as an ecological process. Collaborative members support prescribed burning of as many acres of the project area as possible. Research has shown that stands that have been thinned and broadcast burned fare far better during a wildfire event than stands that have been only thinned. In addition, we urge the interdisciplinary team to design the project in a way that creates large burn blocks and burn units that can make future prescribed burning more economical and operationally feasible, and also aid in making future fire management operations more effective and safer.

Commercial thinning, as described in the planning process, will contribute to restoring stand structure in line with historic range of variability and desired future conditions, shift species composition towards fire and drought-tolerant species, and reduce risk of high-severity wildfire and insect outbreaks. Commercial treatments in the project area have the potential to generate revenue and support numerous goals of the Wasco County Forest Collaborative. Planning projects with the potential for commercial treatments is important to support local jobs and



Wasco County **FOREST** Collaborative

milling infrastructure, as well as offset costs associated with non-commercial fuels reduction and restoration activities. We recognize that grant and other funding sources to conduct this work are highly competitive and may not always reach the local landscape, which makes the use of timber revenue all the more important for getting this work accomplished.

The collaborative supports the full range of treatment options necessary to meet the forest health and wildfire risk reduction objectives for the Hootenanny Project. As you consider implementation strategies for this project, fully utilize the Good Neighbor Authority to implement commercial, non-commercial, and prescribed fire treatments on the Barlow Ranger District and Mt. Hood National Forest. Leverage the expertise and resources of Oregon Department of Forestry and collaborative partners to address critical capacity needs that have emerged as a result of the current political situation that is impacting Mt. Hood National Forest staff capacity.

Additional considerations that support the design and implementation of effective treatments include:

- Tethered logging systems are becoming more common and are utilized by local contractors. The logging systems analysis for the Hootenanny Project should include an assessment of the use of tethered logging systems for any slopes that may have previously been considered for skyline logging.
- Retain all Oregon White Oak within the planning area, unless removing an oak tree is necessary for public safety. Cutting single stem oak often results in resprout that creates clumps of small oak. This may exacerbate fuels accumulation and make it more difficult to maintain fuels treatments over time.
- Collaborative members support implementation of prescribed burning, including pile burning and broadcast burning in the planning area. Based on the information presented by Forest Service specialists in previous projects, piles should be burned within two years of construction to reduce potential impacts of Ips beetle.

Retention of Large and Old Fire-Tolerant and Drought-Tolerant Trees

Consistent with our collaborative agreements in past projects, and the requirements established as part of the Insect and Disease CE category, we support retaining the oldest and largest trees within treatment units, especially drought- and fire-tolerant species such as Oregon White Oak, Ponderosa Pine, and large old Douglas Fir. These trees serve as essential biological legacies that



Wasco County **FOREST** Collaborative

enhance forest structure and contribute to ecological resilience. Retention of these trees should remain a priority to restore forest ecosystems and wildfire resilience in the project area.

As discussed during the planning process with Wasco County Forest Collaborative members and partners, project documentation should clearly describe how old, large trees will be retained. This should include information about the prescription(s), description of “thin from below” and how the public should interpret the silvicultural approach utilized in the project (i.e. removing small trees first until basal area or retention requirements are met, etc.). This information will help members of the collaborative better communicate the importance of this project to the public. The group is also interested in learning more about how the stand exam information, prescriptions, and other field data is used to develop cutting prescriptions for the project. As part of project implementation, Wasco County Forest Collaborative respectfully requests a follow up presentation to learn more about this process and how the data collected through project planning informs the retention of large fire and drought-tolerant tree species.

Riparian Reserve Treatments in Dry Forest Ecosystems

WCFC supports treatment activities in riparian reserves within dry forest ecosystems as an important step toward reducing fire risk and improving ecological function in line with the Aquatic Conservation Strategy. The collaborative supports the inclusion of treatments, such as thinning and prescribed burning, that restore the health of riparian areas. Riparian forests in the Hootenanny Project area have been impacted by fire suppression and past management. Restoring stand structure and function in line with historic range of variability and desired future conditions is important to maintaining overall landscape health and supporting watershed function. These treatments should support the retention of snags, down wood, and live trees that can become future large woody debris.

Botany and Invasive Plants

Collaborative members appreciate the inclusion of project design criteria that will reduce the spread of invasive weeds. Specifically, the collaborative supports identifying existing invasive weeds and conducting pre-treatment to reduce potential spread, including measures that reduce the potential of machinery spreading invasives, and re-seeding native vegetation along skid trails or other treatment areas that will not re-seed on their own. Restoring understory plant communities and reducing spread of invasive annual grasses is an important objective that supports forest health, wildlife habitat, and fire resilience.



Wasco County **FOREST** Collaborative

Temporary Roads

WCFC members appreciate the temporary roads maps provided as part of the planning process. The collaborative supports the use of existing temporary road alignments, both known and unmapped based on LiDar data, where possible and in line with the project design criteria for the project. Successful implementation of the project will require the use of temporary roads, which can have a long-term impact on soils and hydrology, and in some cases facilitate motorized use in locations not suitable for those activities. Given the reliance on temporary roads in the planning area, WCFC supports inclusion of project design criteria in line with past projects such as Rocky Restoration Project and Grasshopper Restoration Project. The final documentation associated with the Hootenanny Project should make clear the requirements associated with temporary road construction and rehabilitation post-treatment. To the extent practicable, limit the total number of temporary road miles required to fully implement the project.

Wildlife

The proposed treatments will restore the structure, function, and species composition of the project area towards a desired future condition that is more resilient to wildfire and drought. Numerous wildlife species will benefit from the long-term health of the forest, including many game species such as elk, turkey, and deer.

The Hootenanny Project area may provide some marginal Northern Spotted Owl (NSO) habitat in its current condition. The collaborative is interested in learning more about how the "likely to adversely affect" NSO determination was reached as part of the planning process. The project area is dominated by dry, fire-dependent forests that need density reduction and reintroduction of fire as a disturbance. The current condition of the Hootenanny Project area is well outside the historic range of variation, and any habitat that currently exists is likely an outcome of more than a century of fire suppression, which allowed for the creation of multi-layered canopies and dense forests. In its current condition, this part of the National Forest is very susceptible to high severity fire and insect and disease outbreaks, as identified in numerous analyses. If left untreated, we would eventually see a significant loss of habitat due to high severity fire. Large patches of high severity fire in dry forests are well documented in other parts of the Pacific Northwest region as resulting in significant losses of NSO habitat. To the extent possible, WCFC supports a holistic assessment of habitat impacts to NSO in the Hootenanny Project, accounting for both potential short-term impacts as well as the long-term benefits of the proposed project.

Coordination with Oregon Department of Fish and Wildlife (ODFW)

Given the importance of fostering cross-boundary treatments that reduce wildfire risk and benefit wildlife, we recommend coordinating closely with ODFW White River Wildlife Area to align



Wasco County **FOREST** Collaborative

project activities. The planning area overlaps migration corridors and winter range for deer, elk, and other species. Treatments should be designed to help enhance forage and habitat and reduce barriers to wildlife movement.

WCFC values our partnership with the Mt. Hood National Forest and appreciates the dedication of the Forest Service staff advancing our shared goals of forest and community resilience. Your team's consistent engagement with WCFC has been instrumental in aligning project outcomes with community priorities, and we look forward to working together to ensure the success of the Hootenanny Project.

Thank you for the consideration of our comments. We look forward to continued collaboration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Spaeth'.

Andrew Spaeth
Facilitator
Wasco County Forest Collaborative
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wascoforest@gmail.com