

REGIONAL ECOSYSTEM OFFICE

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MEMORANDUM

DATE: February 10, 1998

TO: Robert W. Williams, Regional Forester, Region 6, Forest Service
Elaine Zielinski, State Director, Bureau of Land Management OR/WA

FROM: Donald R. Knowles, Executive Director *Don Knowles*

SUBJECT: Regional Ecosystem Office Review of South Cascades LSR Assessment

Summary

The Regional Ecosystem Office (REO) and the interagency Late-Successional Reserve (LSR) Work Group have reviewed the South Cascades Late-Successional Reserve Assessment (LSRA or Assessment). The REO finds that the LSRA provides sufficient framework and context for future projects and activities within the LSR. Future silvicultural and salvage activities described in the LSRA that meet its criteria and objectives, and that are consistent with the Standards and Guidelines (S&Gs) in the Northwest Forest Plan (NFP), are exempted from subsequent project-level REO review.

Basis for the Review

There are two REO review requirements that were considered during our review.

1. Under the S&Gs for the NFP, a management assessment should be prepared for each large LSR (or group of smaller LSRs) before habitat manipulation activities are designed and implemented. These assessments are subject to REO review. This review considers whether the assessment contains sufficient information and analysis to provide a framework and context for making future decisions on projects and activities. The eight specific subject areas that an assessment should generally include are found in the NFP (S&Gs page C-11). The REO may find that the assessment contains sufficient information or may identify topics or areas for which additional information, detail, or clarity is needed. The findings of the review are provided to the agency or agencies submitting the assessment.
2. The review also considers treatment criteria and potential treatment areas for silvicultural, risk-reduction, and salvage activities if addressed in the LSRA. When treatment criteria are clearly described and their relationship to achieving desired late-successional conditions are also clear, subsequent projects and activities within the LSR(s) may be exempted from further REO review, provided they are consistent with the LSRA criteria and S&Gs. The REO authority for developing criteria to exempt these actions is found in the S&Gs (pages C-12, C-13, and C-18). If such activities are not described in the LSRA and exempted from further review in this memo, they remain subject to future REO review.

Both aspects of this review are described below.

Scope of the Assessment and Description of the Assessment Area

The REO reviewed the LSRA in light of the eight subject areas identified in the S&Gs (page C-11). Questions and discussions by LSR Work Group reviewers led to additions and revisions which are contained in Review Copy 3 (dated December 1997), and supplemented by a January 7 DG message with *Riparian Reserve Desired Future Condition (DFC) language*, a January 21 FAX revising three sections of Chapter 4 related to thinning and large woody material (LWM), a January 30 FAX showing multiple edits reflecting assumptions made by the reviewers evaluating the Assessment, and a

February 3 DG submittal of revised treatment criteria for risk management in pine. The REO finds that the LSRA with these revisions provides a sufficient framework and context for making future decisions on projects and activities within the LSR.

The South Cascades LSR Assessment addresses a very large acreage (over 720,000 acres) encompassing five “mapped” LSRs, in a variety of ecological conditions, administered by seven administrative units in two provinces of the NFP. LSRs covered include RO222 (508,000 acres), 224 (21,500 acres), 225 (39,800 acres), 226 (49,800 acres), and 227 (101,600 acres). The east half of RO227 is primarily covered by a Winema National Forest document incorporated into this LSRA. The assessment does a good job, particularly considering the scale and complexity of the area, of describing conditions, processes and expectations within the five LSRs. Further, the assessment describes ongoing inventories, analyses, and planning that will continue to fine-tune and identify management needs within the LSRs.

The Assessment does not address the 100-acre “unmapped” LSRs in the area of the Assessment. The REO Work Group anticipates that the administrative units involved will submit Assessments of these LSRs at a future date, to appropriately address the management issues within and around them.

The Assessment describes the land ownership and land allocations of the surrounding areas, but is somewhat weak in describing how surrounding conditions (e.g., fire ignition sources) effect within-LSR treatments, and how non-LSR activities (such as, those affecting connectivity between LSRs) might affect LSR objectives. The Assessment recognizes these weaknesses and defers further consideration to site-specific analysis or, in the case of non-LSR areas, to existing plans and subsequent project analysis.

The assessment sets a DFC in terms of risk, percent late-seral species and conditions, late-seral block size and connectivity, and so forth. “Late-seral” is defined and additionally referenced in Appendix D-Seral Stage Classification. Risk is documented as relating to fuels risk, rural interfaces, lightning and juxtaposition with key habitat. Priority-setting for treatments is well discussed, focusing on protecting and enhancing the most functional large blocks of habitat, and key connectivity areas, first. Stand treatments are clearly described with appropriate criteria. Stand treatments are derived from comparing current conditions with DFC using a logical synthesis process. Resultant priorities appear appropriate. Existing uses, from permits to habitat development projects, are well documented in Table 6. The history of forest development in the absence of wildfire over the past 80 years is particularly well done, as is the section on late-successional forest related species known or thought to exist within the LSRs, and the logic and explanation of DFC.

A broad-scale conclusion of the LSRA is that fire risk management and aquatic habitat restoration should be priority activities in these LSRs. These conclusions are illustrated in creative “spider diagrams” and “bubble charts” which give line officers a visual cue as to potential priorities (with the necessary caution that the conclusions need to be ground-truthed prior to project design). Additionally, other silvicultural treatments and salvage actions are described.

Because of the size and complexity of the area covered, references to additional analysis are recognized as key to project design. For example, we note that the “risk DFC” of no more than 28 percent of the area be in high (fire) risk classification is, as stated in the assessment, subject to ground-truthing and priority setting. The assessment further points out that watershed analyses will continue to show different, and perhaps conflicting specific information on pathways, patterns, structure, and disturbance dynamics than the assessment. The BLM and FS administrative units recognize the document is, in many ways, a broad-scale assessment that will continue to be the subject of fine-tuning and site-specific analysis. Planning and project development outside of the LSRs will continue to consider fire risk to LSRs, and will consider connectivity between LSRs.

Criteria for Developing Appropriate Treatments

A citation from Chapter 3 - Desired Future Conditions, is key to understanding the objectives and level of treatments proposed within the LSRs. The third paragraph in this chapter reads, in part:

The amount of treatments proposed for exemption from further REO review, or the amount of projected treatments overall, are not intended to represent the long term activity levels needed to reach desired future conditions. The natural growth and evolution of forest stands and habitat over time will be a major factor in attaining desired conditions. Projected amounts of treatment are intended to represent a conservative management approach based on the limits of existing data and experience in managing for late-successional conditions.

As noted in the Assessment, project planning will be fine-tuned through Watershed Analysis, NEPA, and site-specific determinations of the need for treatment. Projects not clearly beneficial to NFP objectives should be deferred in favor of natural stand development.

Chapter 4 - Treatment Criteria and Needs, contains descriptions of indicators of treatment needs, criteria under which those treatments are expected to be conducted, and rough estimates of the potential treatment acres - usually by administrative unit. Treatments are divided into four major sections: to enhance late-seral conditions, to reduce risk of large scale fire, those for salvage, and activities other than silviculture. The treatment acreage shown are not additive because more than one treatment may be applied to the same acres.

Conclusion

Based on the documentation found in the LSRA and the amended information, the REO finds that the LSRA provides a sufficient framework and context for future projects and activities within the LSR. Silvicultural, risk, and salvage activities as specifically described in Chapter 4, when conducted consistent with the NFP S&Gs, and following the priorities, emphases, site-specific analysis, and other considerations discussed elsewhere in the LSR Assessment, are exempted from subsequent project-level REO review. Silviculture, risk, and salvage proposals other than those as described in the preceding sentence remain subject to REO review.

Because of the scope and complexity of the assessment, and the number of administrative units and personnel who will be involved implementing it, our review has necessarily taken extra time and been, at times, complex. We appreciate both the efforts of authors to create a clear and valuable document while integrating a wide range of complex conditions spread over seven administrative units, and the patience and persistence of the team in responding to our review questions and requests. The team has done an excellent, highly professional job.

cc:

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