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REGIONAL ECOSYSTEM OFFICE

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MEMORANDUM

DATE: July 28, 2015

TO: Patricia Grantham, Supervisor, Klamath National Forest

FROM: Becky Gravenmier, Acting Forest Service REO Representative to the RIEC

SUBJECT: Regional Ecosystem Office Review of the Westside Fire Recovery Project on the Klamath National Forest

Summary
The Regional Ecosystem Office (REO) interagency Late-Successional Reserve (LSR) Work Group has concluded its review of the documents provided by the Forest regarding proposed activities of the Westside Fire Recovery Project in the Seiad and Eddy Gulch LSRs. The REO, based upon the review by the LSR Work Group, concurs with the Klamath National Forest in its finding of consistency with the Standards and Guidelines (S&Gs) under the Northwest Forest Plan (NWFP) for the Westside Fire Recovery Project.

Basis for Review
Silviculture, risk reduction, and salvage treatments in LSRs are subject to REO review under the NWFP S&Gs (C-12 to C-15). As required by the NWFP S&G (C-11), the Klamath National Forest prepared a Late-Successional Reserve Assessment (LSRA) for multiple LSRs on their forest, including the Seiad and Eddy Gulch LSRs. The Klamath National Forest Late Successional Reserves Forest Wide LSR Assessment was reviewed by the REO in 1999. During that review, REO concluded that silvicultural and risk treatments that were consistent with the LSRA management recommendations and with NWFP S&Gs were exempted from subsequent, project-level REO review. The forest determined that proposed silvicultural and risk-reduction activities in the Westside Fire Recovery Project were consistent with the LSRA and with the NWFP and thus did not request review of those activities. The forest did request REO review of risk-reduction salvage activities, finding they are consistent with the LSRA recommendations and the NWFP S&Gs and seeking REO concurrence.

Project Scope and Description
In August 2014 multiple lightning fires burned together to create three large fires on the west side of the Klamath National Forest. The Beaver Fire, Happy Camp Complex, and the Whites Fire of the July Complex are included in the Westside Fire Recovery Project. These three fires burned a total of 183,200 acres, which includes 162,300 acres of National Forest System lands and 20,800 acres of private land.

The Happy Camp Complex burned approximately 56,400 acres of the Seiad LSR and the Whites Fire burned approximately 24,800 acres of the Eddy Gulch LSR. Approximately 15,000 acres of the Seiad LSR had greater than 75% mortality and approximately 5,000 acres of the Eddy Gulch LSR had greater than 75% mortality.

The forest is proposing to do 3,372 acres of risk reduction salvage in the Seiad LSR and 500 acres of risk reduction salvage in the Eddy Gulch LSR. The risk-reduction salvage would occur in areas with 75%+ tree mortality. The total area proposed for risk-reduction salvage is 5,740 acres in all allocations (LSR and non-LSR).

The treatments proposed in LSR are designed to increase the effectiveness of the other risk-reduction measures (fuels management zones, roadside fuel reduction, WUI fuel reduction, and understory prescribed fire) being implemented in the project area by reducing future fuel loading that could result in a future high severity fire that would retard the post-fire recovery of late successional habitat in the LSRs.

Review of the Project

Activities reviewed by the LSR Work Group are modified from Alternative 3 in the Westside Fire Recovery Project Draft Environmental Impact Statement, with those modifications described in the supplemental document Westside Fire Recovery Project: Klamath National Forest Late Successional Reserve Assessment Evaluation (July 12, 2015). The Work Group's review was based on the information within these documents, briefings, and conference calls.

The interagency LSR Work Group review concluded that the proposed treatments in LSRs meet LSR objectives and S&Gs. This conclusion was reached in part for the following reasons:

- Snag retention areas have been designated within the salvage units, usually on the lower slopes that have historically burned with lower severity or within pockets of larger trees.
- The project includes treatments designed to enable restoration of low-intensity fire regimes to reduce the incidence of future catastrophic events and protect existing late-successional forests as described in the NWFP S&Gs (C-12, 13).
- No coarse woody debris existing prior to the fire would be removed, and coarse woody debris within patches of standing trees would not be removed.
- In the Seiad LSR, 6% of the moderate and severe mortality area would have risk-reduction salvage. In the Eddy Gulch LSR, 2% of the moderate and severe mortality area would have risk-reduction salvage.
- The cumulative amount of tree removal for risk reduction, including actions that were not subject to REO review, is approximately 10% of the burned area within the LSRs.
- Risk-reduction salvage in LSR would reduce the threat of future stand replacement fire by reducing fuel loading. Risk-reduction activities are integrated with fuel breaks in a strategy that reduces the risk of future high severity fire.

Conclusion

Based upon the interagency REO LSR Work Group review, the REO concurs with the Forest's conclusion that the risk-reduction salvage activities proposed in the Westside Recovery Project are consistent with the NWFP.

If you have questions regarding this review, please contact Kim Mellen-McLean at 503-808-2677.

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