



Meeting Notes

BLUE MOUNTAINS Forest Plan Revision - 2015

Malheur, Umatilla, and Wallowa-Whitman National Forests

Technical Forestry Meeting on the Blue Mountains Forest Plan Revision

Hosted by Union County and High Desert Partnership La Grande, Oregon | Nov. 12, 2015

These notes reflect the best efforts of the notetaker to capture the discussion of meeting participants, but in no way are these notes a word-for-word transcript as the notetaker may have unintentionally missed some statements or dialogue. Also, the notes do not attempt to correct or clarify any statements made by participants.

Participants (as listed on the sign-in sheet): Mark Davidson, Irene Jerome, Rex Storm, King Williams, Larry Blasing, Buck Fullerton, Dave Price, Jack Southworth, Jeff Blackwood (facilitator)

U.S. Forest Service (USFS) participants: Tom Montoya, Genevieve Masters, Steve Beverlin, Sabrina Stadler, Gunnar Carnwath, Kris Stein, Alissa Tanner, David Hatfield, Peter Fargo (notetaker)

Organizations represented: Union County, American Forest Resource Council, Associated Oregon Loggers Inc., Iron Triangle Logging, Grant County Public Forest Commission, Boise Cascade, Blue Mountain Alliance, High Desert Partnership, and USFS

Introductions: Who are you, where are you from, and what is your greatest concern regarding vegetation management programs on these National Forests?

- Need to treat more than 5% of the forest; Preferred Alternative is not enough; proposed Management
 Areas and set asides, in addition to existing ones, severely limit the land available for timber harvest; under
 the current Preferred Alternative, we won't meet needs of the forest ecologically, or the needs of the
 community economically or socially.
- Representing Union County; concerned about evolution of wildfire as active management; not acceptable
 to have smoke in valleys for weeks on end; serious health issue for the most vulnerable people in our
 community; uncontrolled wildfire as a management tool is not acceptable; we need more mechanical
 treatments. Refer to Union County's comments from August 14, 2014.
- Representing Associated Oregon Loggers; statewide trade association representing nearly 60 companies working in the forest sector, not just loggers; have been working on this Forest Plan since 2003 and Inter-Columbia basin before that; current management and proposed management in the draft Plan completely fail the forest sector and the local socio-economic communities; you are currently managing the forests through catastrophe; National Forests don't operate in a vacuum; private landowners are extremely frustrated. In 2014 we submitted over 90 pages of comments, which are a good summary of our concerns.

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- We are extremely concerned there is not enough volume in the Preferred Alternative; you have a Plan that uses old science; seems that you're choosing when to use the best-available science; concerned that production is not a goal; with the focus on old forest, snags, etc. and Management Areas, there is not much land left to work.
- Don't think the Plan does enough for vegetation management; I am very concerned about this issue; we need the industry infrastructure to accomplish our goals for restoration; the proposed numbers are not adequate.
- Representing Boise-Cascade; Forest Plan is socially, economically, and logically inadequate; it doesn't appear that our comments have been adequately recognized or addressed.
- I'm part of the Grant County Forest Commission and Blue Mountain Forest Partners but not speaking for either one of them today; our group spent a lot of time offering our comments on the draft Plan; Rex, Irene, and Boise-Cascade were involved; there were resource issues, legal issues, etc.; draft Plan was a disaster; my biggest fear is we're going to try and salvage as much from that disaster as we can; our opinion is we need a whole new start, including a new draft and new planning team.
- I represent Iron Triangle; I helped with AFRC's input on the draft Plan; it is woefully inadequate; there are problems with management allocations and Desired Conditions; the implications are that timbered acres available for harvest are inadequate; the ASQ has major problems associated with it; ASQ doesn't reflect what Malheur's silviculturist put out; this Plan, if it goes forward, will have legal issues and will be appealed; start with the general framework for management allocations; when timbered acres available for harvest are inadequate, you end up with a wreck.
- I'm the Forest Supervisor on the Wallowa-Whitman; here to listen and seek solutions; look forward to Gunnar's presentation; hope we can learn from each other and work together.
- Forest Plan Revision Team Leader for three years; it is worth emphasizing that Gunnar has done a great job digging into what has been done; he didn't build it and is not defending it; he is just trying to explain it; we're all here together trying to find solutions together.

Presentation by Gunnar Carnwath, Ecologist, U.S. Forest Service (The following is a limited sampling of the presentation and discussion. For more details, please see the presentation slides and briefing paper, "Timber Topics: Frequently Asked Questions" starting on page 9.)

- Range of Variation is a dynamic reference condition for forest management under an ecological model.
- History tells us fire was frequent in the past; we shut off the "fire faucet" in 1900s
- We have a broad landscape over which to achieve Desired Conditions.
- Climate is an important driver; we are looking at the conditions we expect to have in the future and preparing for a range of variability.
- We need to restore, and then adapt. We have departed from the past range of variability; need to catch back up to that, then adapt to the expected conditions of the future.
- Historic Range of Variation is a well-established model for forest management.
- Historic Range shows a current deficit in Old Forest Single Story structure, among other structures.
- ASQ does not include those areas that are Unsuitable for regularly scheduled timber harvest but are still available for harvest if there is an ecological need to treat them.
- We get a lot of Qs about Management Areas; it is not a straight crosswalk between Management Areas and suitability (e.g., General Forest is generally suitable).

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- Benchmarks 2 and 2A seek to maximize the biological production of suitable areas over decades; one
 important difference: 2A allows declining flow and increases production by 40% in first decade.
- Fire Regime Condition Class (FRCC) Departure Score: High score means high risk of severe ecological damage; Alternatives D and E achieve about the same reductions over 50 years.
- Alternative A (current Forest Plan) does not maintain 1990 levels for Suitable Acres or ASQ. Reasons include: court-ordered decisions that affected suitable acres; also soil suitability and modeling
- Old forest Management Areas are not ecologically sound; in general, we think we need to move toward more old forest across the entire landscape, because there is a significant deficit of that structure type.
 There is a range of Standards / Guidelines for old forest across the alternatives.

Questions about the presentation

- Were AFRC assumptions on ASQ from AFRC's latest comments? Concerned they are out of date.
 - USFS Ecologist: Yes; included assertions for both saw and non-saw harvest.
 - Have the effects of climate change been considered in developing the current ASQ?
 - USFS Ecologist: In a sense; HRV is the desired condition, and the underlying assumption is that moving toward Historic Range of Variation will enhance resilience in the face of climate change.
 - Given that ASQ was not met from 1990 Plans, isn't there a backlog that needs to be met first?
 - USFS Ecologist: ASQ is based on current vegetation conditions so any backlog would be accounted for. I think those 1990 ASQs were not sustainable in the first place; keep in mind that limitations on harvest will likely not be due to ASQ; more important factors include budget, species viability, and the social acceptance of going into different areas.
- Given the discrepancy between ASQ and actual harvest over the past ten years, isn't there a backlog?
 - USFS Ecologist: ASQ is a decadal limit, if not met in the current 5 years, it can be made up in the next 5 years.
 - Is the Existing Condition current?
 - USFS Ecologist: Existing Condition is current as of 2005; it is extrapolated over thousands of acres.
 - The Malheur would have been above 70 MMBF in 2015 if there hadn't been so many fires and reduced green sales. Do these models factor in fires and the accumulation of biomass leading to insect, disease, and fire?
 - USFS Ecologist: Current and future conditions do factor in effects of fire, etc.

Afternoon Discussion: Questions, comments, or concerns about what we heard this morning?

- Suitable lands are a concern; after whittling away lands that the agency decided were not suitable for timber harvest, only a quarter of the pie remains; in our book, it's a non-starter to take ¾ of the pie off the table and even then restrict the quarter that we are able to work with.
 - One concern is the initial withdrawal; the next concern is the discretion allowed in green, yellow, and red zones (as presented on slide 47).
 - You need to be more responsive to place-based communities; a large percentage of the population disagrees with you. Why can't you do more?

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- USFS: What Gunnar was saying is we can harvest from some "Unsuitable" areas, and that doesn't count against your ASQ.
- If we're honest, we can look at recent history; the agency doesn't harvest from areas that are Unsuitable (yellow areas on slide 47) and focuses instead on areas that are less contentious.
- Malheur National Forest Supervisor: Rex is right. We rarely harvest from Inventoried Roadless Areas (IRAs);
 those are in the yellow bars on slide 47.
 - In the Malheur collaborative, we have all agreed we should change the boundaries on the Inventoried Roadless Area (IRA); just because the Plan says no regular timber harvest in IRAs doesn't mean you can't go ask the FS Chief to reclassify these areas.
 - What are the factors that take an area from Unsuitable to Unsuitable-but-Available?
 - IRAs are a political decision done with an EIS; the Forest Plan could challenge the rule.
 - USFS: The Roadless Area Conservation Rule cannot be changed without a new rulemaking; it
 was done through regulation outside of the Forest Plan Revision process; it went through years
 of litigation and was resolved; the boundaries of IRAs are "burned into the ground," because
 there are specific provisions that define what Forest Supervisors can do with IRAs.
 - USFS: Forest Sups have not had a chance to do much within the IRAs until after the IRA litigation was resolved. We are now exploring projects there.
 - What about other Management Areas, like Backcountry 3A and 3B?
 - USFS: Those are part of the Roadless Area Conservation Rule.
 - How much of 3A and 3B are Inventoried Roadless?
 - USFS: Cannot say for certain at the moment; we will clarify that and get back to you.
 - Can we free up land as part of the EIS process to use for sustained yield? If Inventoried Roadless Areas cannot be considered Suitable, are there any Management Areas in the yellow bars (slide 47) that have flexibility?
 - Riparian Areas follow PACFISH/INFISH for buffer widths.
 - PACFISH/INFISH have attempted to create conditions that have never existed historically.
 - Also need to look at Oregon state standards.
 - USFS: There is no limit to the work you can do as long as you're moving toward the Desired Condition; we are moving toward a Desired Condition framework.
 - Industry doesn't believe the agency can deliver on harvest in these yellow "Unsuitable" areas (slide 47); they might as well be red, or "Not Available."
- "Suitable" lands have a number of restrictions on them already; industry would like to move "Unsuitable-yet-Available" lands to "Suitable" as much as possible, because "Unsuitable" lands have not produced results.
 - Why use that word, "Unsuitable." USFS: That is language from National Forest Planning Rule.
- AOL's second concern: Why let nature take its course in municipal watersheds? Doesn't that have a negative impact? (e.g., fire)
 - USFS: We can treat those areas, even with commercial thinning, if we are moving toward the Desired Conditions.
- USFS: Alt. D maximizes areas that are Suitable; only excludes areas we could not find a way to justify.
- Desired Conditions in this Plan are way too restrictive. It looks like we have included everyone's desires; we need Desired Conditions to be better defined, so we can meet them.

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- Grant County is concerned with the Vision statement in the Plan; Historic Range of Variation (HRV) cannot be a vision; Plan Goals are based on the Vision, and so are Desired Conditions. Desired Conditions appear to be fantasies of the USFS; they don't look like what the public wants.
- USFS: HRV is not necessarily the Desired Conditions, but it was a major influence. We modified HRV
 to describe the Desired Conditions. For instance, large wildfires were part of HRV, but they are not
 socially acceptable, so we limited HRV to address this issue. We did something similar with wildlife.
- Desired Condition tables with numbers in the Plan will be used against us by environmentalists. It seems that we are creating habitat just to create habitat.
 - USFS: There is no expectation in this planning period that we will meet all Desired Conditions; we just need to move toward them.
- Look at slide 11: The HRV target is way above anything that we can harvest in the foreseeable future. If you take the amount of acreage in your targets for Old Growth Single Story, you're going to lose half your production on the National Forest. HRV is not consistent with the Multiple Use-Sustained Yield Act.
- USFS: It will take a long time to get Old Growth Single Story.
- USFS: It is possible to thin Old Forest Multi-Story and turn it into Old Forest Single-Story; that would move us toward the Desired Condition; it is possible to do that with other stand structures and get more volume.
- Why do the red bars change on slide 47? If it's Unsuitable, shouldn't it be Unsuitable in all alternatives?
 - USFS: Those changes reflect changes in wilderness areas.
 - As soon as you tag an area as "Unsuitable," you open the door to litigation; we need to maximize the Suitable areas as much as possible.
- PACFISH/INFISH is ridiculous on the Eastside; 300 feet on each side of the riparian zones is crazy; we should be managing the riparian zones, so they don't burn up in the fires.
 - USFS: I think Alt. D addresses that concern
 - No old forest restrictions
 - Thinner Riparian Management Areas (RMAs)
 - No proposed Wilderness Areas
- USFS: You are right, and there are other people who are also right; all are different ways of shaping the world; that's why we have alternatives. Is there anything major that we have missed in the alternatives?
- There is a contradiction in the Plan; it says HRV is important but prevents that work from getting done on the ground; it creates a no-harvest / hands-off landscape. We are losing more ground to fire/insects than we're gaining.
 - USFS: Should we be wording our Management Areas differently?
- Ask yourself who you are listening to -- communities of place more than interest groups?
- The Desired Condition sounds like we want more insects and disease.
- The larger the yellow / red bars are on slide 47 (Unsuitable-but-Available and Not Available), the more aggressively we have to manage the green bars (Suitable). If we have only 30% of the land base left, we need to be able to manage it more actively than ever before. The Standards / Guidelines are too restrictive.

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- It's essential that we keep these mills going, so you have the infrastructure you need in the future. The thrust of this Plan needs to work toward that goal.
- USFS: The 3rd slide shows how much volume used to be cut before 1992; we removed a lot of big trees (and their volume) from the forest; salvage in the mid-80s was huge, and a lot of big trees came off the forest. The bottom fell out in 1992, beginning with Endangered Species Act listed fish.
- USFS: It is not just the growth that we have available; we cannot just multiply the growth rate by number of acres. We want to move toward Desired Conditions and have no declining flow in the future, and that is why there are restrictions.
- Malheur National Forest Supervisor: Minimizing >21" trees is not necessarily what we're doing,
 e.g., on the Malheur. Including one more >21" tree per acre in a project makes an enormous
 difference in volume and economic viability. In some places, it makes sense to cut larger trees to
 move us toward Desired Conditions.
- The change in Suitable Acres over the past 20 years is staggering; I assume it was mostly PACFISH/INFISH, but how much were other issues?
 - USFS: Roadless Areas and soils were a significant consideration.
- What does the Plan say about salvage? The restrictions appear arbitrary.
- Why isn't there a way to deal with salvage in the Forest Plan, so this doesn't need to be dealt with on a case-by-case basis? NEPA is the biggest impediment we have; addressing salvage in the Plan would be logical.
 - USFS: The reason for leaving trees is to provide species viability for a variety of species.
- This looks like a prohibition on salvage harvest; we are concerned that 70% of the land will be locked up as it is for large trees.
- There are pages and pages of analysis on ecosystem issues (e.g., woodpeckers, fish), but there is very little social/economic analysis. What about the impacts on the infrastructure that you need to achieve your restoration goals?
 - FS: We heard you there. There will be an economic analysis included in the final Plan about impacts on industry / infrastructure. There are also social and economic Desired Conditions in the Plan.

Closing Discussions

- Can we get into more detail about Desired Conditions and where there are concerns?
 - USFS: If HRV is not the best framework, what is an alternative? HRVs are not the only driver but heavily influence the Desired Conditions.
 - Instead of looking at Forest-wide Desired Conditions, look at smaller Management Areas or watersheds.
- Can you test if your Management Areas are going to get you closer to overall Forest goals? Need Desired Conditions for each Management Area.
 - Example: Management Area 4 is like a Roadless Area; it is trying to accomplish so many ecological objectives that you've already accomplished elsewhere; it should be more aggressive management; disturbance is needed; harvest and reforest.
- Look at Desired Conditions and make sure descriptions are not boxing you in.

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- In your draft, you had 500 million feet of net growth per year. The old Forest Plan pushed cut down to 152 million feet per year. The presumption is instead of harvesting the balance, you are going to burn it. Burning 350 million board feet per year is not acceptable.
- What about increasing Suitable acres?
- Take Alternative D. You have to shrink your Riparian Management Areas (RMAs) and cut >21" trees.
 - USFS: If we went with RMAs smaller than in Alt. E, it would be a non-starter with the fish and wildlife agencies. We would need to present science that would give them regulatory certainty.
 - Industry: A 300-foot buffer is a lot to ask around streams; 100 feet is all that is ecologically defensible.
 - USFS: We don't currently have a 100-foot justification. Can you provide scientific information that would back this up? We need to work within a regulatory framework.
 - Look at what the Oregon and Washington state agencies have done.
 - USFS: Keep in mind that making the justification under ASQ—regularly scheduled timber harvest—is a challenge.
- These alternatives should be analyzed in the EIS.
- What about Declining Flow? USFS: There is an argument for it. Much of the forest is overgrown. We may not like the answer in 10 years, but there is a good reason to bring areas/classes back toward HRV.
- Are mills prepared for small diameter?
 - Yes, we have been tooled for small diameter for years. We are not working at full capacity; we can add many shifts to our mills. Give us a bell curve of material, and we can figure out what to do with it.
 - Small wood is okay, as long as there is enough big wood to pay for it.
 - It's not the agency's job to create markets; it is their job to provide a reliable/predictable supply.
 - Forest is already in a declining-flow condition; it is losing future growth/productivity due to high mortality rates; current draft Plan does not address this; the forest is growing slowly in many areas; we need to help it grow faster.
 - Even on the Malheur's dry end, we can grow a 30-36" tree over 150 years; it is possible to find ways for them to grow.
- Can we harvest more large trees?
 - Malheur National Forest Supervisor: The Malheur is taking a science-based approach on a siteby-site basis, which allows for cutting some large trees along with more small ones.
 - The environmental community should not be able to have it both ways. They ask for analysis on a site-specific basis (e.g., watershed), but they want >21" trees across the landscape with no exception.
 - USFS silviculturist: I would like to see broader sideboards, so I never need to do a Forest Plan amendment.
- You haven't adequately addressed the Desired Condition for social/economic issues.
- On page 124, there is a statement on interdisciplinary process and not necessarily getting the most money for the cut.

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- Malheur National Forest Supervisor: Part of the reason we harvest large trees is to provide economic benefits to the community. It is an ecologically-centric Plan, and we need to balance it in places.
- You need to have the ability to access and protect the forest, including a road system to fight fires. Desired Conditions should expressly state the benefits of roads, especially on Management Area 4.
- The Forest Service Chief made the decision on IRAs, and made the choice for you: You need to manage the forests intensively everywhere else.
- Can we increase the assumption of volume per acre?
- How can we ensure that economic sustainability and ecological resilience are not limited by the sideboards we have now?
- How can we be more clear about our goals for each of the Management Areas?

Final Words

- I appreciate your patience; this has been a good and rich dialogue.
- We need to look harder at how we may be able to increase the volume and how can we not put such tight walls on our approach.
- Gunnar did a great job.
- This is the chance to improve on things that we've been living with for over 20 years.
- This is about what I expected; quite a lot of discussion defending what was in the original draft.
- Thanks for listening; at times I can be over-assertive in my communication; that is the result of 20 years of no progress; would like to see a product that unleashes the power of your natural-resource professionals.

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Timber Topics: Frequently Asked Questions

What is the Allowable Sale Quantity (ASQ)?

- ASQ is the maximum amount of volume **potentially available** as part of regularly scheduled timber harvest from **lands suitable** for timber production **per decade**.
- Although it is expressed as an annual figure, it is actually a 10-year cap, within which annual variation is allowed.
- ASQ is primarily influenced by:
 - Desired Conditions
 - Existing Conditions
 - The number of acres considered suitable for timber production
 - An assumption of "non-declining flow" (not required)
- ASQ is not the same as the total harvested volume. It is not a promise or a goal.
- It is not based on budget; larger budget assumptions do not result in higher ASQ.

What is the Total Sale Program Quantity (TSPQ)?

- Total amount of volume estimated to be harvested under each Alternative. TSPQ is not a promise of, or a limit to, what may be done in the future.
- TSPQ volumes come from:
 - lands Suitable for timber production (ASQ)
 - lands *Unsuitable* for timber production but available for timber harvest to meet the Desired Conditions for a particular area (e.g., Riparian Management Areas, Old Forest)
 - Salvage, firewood, post and poles
- TSPQ is influenced by estimated budget.

What is the Historic Range of Variation (HRV) and why has it been used to develop Desired Conditions for the Forest Plan Revision?

- Range of Variation is defined as the variation of ecological characteristics and processes over scales of space and time that are appropriate for a given management application. The fundamental assumption underlying the use of HRV is if historical ranges in stand structures by forest type are maintained on current and future landscapes, then much of the habitat for native flora and fauna should be recreated and maintained. Thus, most species and ecosystem elements should remain viable. (Wiens et al, 2012; Agee, 2003).
- Use of HRV as reference point for Desired Conditions is not an attempt to turn managed landscapes in to wilderness or return to a specific time in the past. Rather, HRV is a lens that helps managers achieve multiple-use objectives.
- There is broad agreement among managers and scientists that HRV provides essential insights for decisionmaking. Managing toward HRV has the following benefits:
 - · protecting biodiversity and ensuring species viability,
 - recognizing the roles of disturbance,
 - widening the options for management, and
 - maintaining resilience and ecological integrity.

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How many acres are considered suitable for timber harvest in the Alternatives of the draft Environmental Impact Statement?

(See the chart in the Addendum for acreage: "Timber Suitability Classification for Alternatives C, D, and E")

- Alternative C has the fewest suitable acreage for timber production because of a greater number of acres of Preliminary Admistratively Recommended Wilderness Area (PARWA), Old Forest, and wider Riparian Management Areas. Alt. C contains additional areas in wildlife corridor management areas that were identified as unsuitable.
- Alternative D has the most suitable acreage for timber production, because Riparian Management Areas are narrower and Old Forest is classified as suitable. The effect of this classification would be to increase the ASQ, which is based on the suitable acres.
- Alternatives B, E, and F have the same suitable acreage, because they all have the same *Standards*, *Guidelines*, and similar *Management Areas* that influence Suitability for timber production. Old Forest and Riparian Management Areas are classified as Unsuitable for timber production.

What is the approach to Old Forest management in the 1990 (current) Forest Plans for the Malheur, Umatilla, and Wallowa-Whitman National Forests?

Eastside Screens:

- In 1994, the Forest Service Pacific Northwest Region regional forester issued "Interim Direction Establishing Riparian, Ecosystem, and Wildlife Standards for Timber Sales on Eastside Forests" (USDA Forest Service 1995c), commonly referred to as the Eastside Screens. It amended the 1990 Forest Plans by establishing riparian, ecosystem, and wildlife standards for timber sales.
- The Eastside Screens amendment emphasizes:
 - retaining and developing late old forest structures and patch sizes within the Historic Range of Variability;
 - maintaining or developing linkages between old forests;
 - meeting requirements for snags, downed logs, and green tree replacements; and
 - retaining most trees greater than 21 inches in diameter.

Old Growth Management Areas:

- All three 1990 Forest Plans designate Management Areas for old growth.
- Old Growth Management Areas are Unsuitable for timber production, but some Old Growth areas may be harvested for other purposes.
- In the 1990 Forest Plans, many Old Growth Management Areas were designated in areas that did not actually contain old forest characteristics. In addition, some areas have been affected by fire, insects, and disease, resulting in changes to species composition and forest structure. As a result, only between 20-40% of designated Old Growth Management Areas actually contain old forest structural characteristics.

Proposed Management of Old Forest and Large/Old Trees

In general, unlike the 1990 plans, the Revised Forest Plan recognizes that Old Forest characteristics are dynamic in space and time and should be managed accordingly.

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	Alt. B	Alt. C	Alt. D	Alt. E	Alt. F
Desired Conditions Direct Old Forest Management?	YES	YES	YES	YES	YES
Designated Old Forest Mgmt. Area?	No	YES	No	No	No
Standard or Guidelines on Harvesting > 21" DBH?	YES; Guideline: Retain >21" DBH (with exceptions)	YES; Standard: Retain >21" DBH (no exceptions)	NO	NO	NO
Standard or Guidelines on Harvesting Old Trees?	NO	NO	NO	YES: Guideline: Retain trees with old characteristics	YES: Guideline to retain trees >150 years old

How are Snags (standing dead trees) and Down Wood addressed in the draft Plans? What are some Standards and Guidelines that could affect post-fire salvage of snags?

- Section 1.14 (Snags and Down Wood, starting on p. 47) in the Proposed Revised Land Management Plan includes the Background, Existing Condition, and Desired Condition regarding Snags and down wood.
- The Desired Condition for snags and down wood is to maintain ecological characteristics within the historic range of variability.
- Examples of Standards and Guidelines that could affect post-fire salvage of snags:

Standard or Guideline	Alt B	Alt C	Alt D	Alt E, F
Harvest no more than 50% of post-fire source habitat (*)	Х	Salvage not permitted	No Standards or Guidelines	Х
No snag harvesting in areas with fire perimeters less than 100 acres	Х	Salvage not permitted	No Standards or Guidelines	Х
Harvest no snags greater than 21" and 50% of 12-21" (**)	Х	Salvage not permitted	No Standards or Guidelines	Х

^{*} Except in the Wildland-Urban Interface

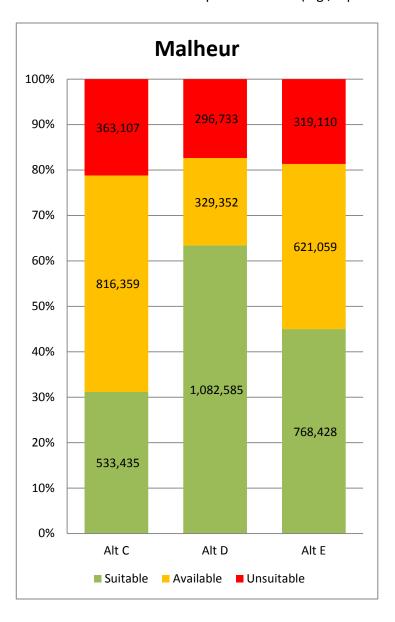
^{**} Except for Danger/Hazard Trees

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Addendum: Timber Suitability Classification for Alternatives C, D, and E

The chart below illustrates acres of land that are either Suitable, Unsuitable, or "Available" for timber harvest within the National Forest under different Alternatives in the draft Environmental Impact Statement. The definitions below are helpful for the purposes of this chart:

- Lands Suitable for timber production allow for regularly scheduled harvest of trees for industrial or consumer use.
- Unsuitable lands are deemed unsuitable for timber production based on criteria established by the National Forest Management Act (Sec. 6k) and the 1982 Planning Rule (Sec. 219.14). In general, this includes land with less than 10% canopy cover, significant regeneration issues/concerns, and lands withdrawn by law or policy (e.g., Wilderness Areas).
- "Available" lands are lands that are Unsuitable for regularly scheduled timber harvest but allow for the harvest of trees to meet Desired Conditions for a particular area (e.g., Riparian Management Areas)



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