An Overview of Bolen Lake – photo credit Rogue River-Siskiyou NF.
Rapid Assessment Team (RAT) Summary and Recommendations for the Slater Fire on the Rogue River-Siskiyou National Forest
November 2-3, 2020

INTRODUCTION

This document makes a recommendation to the Forest on post-fire actions and helps assess various options based upon a very rapid, preliminary, non-binding assessment of initial information. The Forest has the option to mix, match and create new options and will make the determination of how to move forward, in conjunction with the Forest Leadership Team, Regional Leadership Team and the Directors of Natural Resources (NR) and Resource Planning and Monitoring (RPM). The mission of the RAT during its November 2020 review was to help the Rogue River-Siskiyou National Forest assess salvage options and help prioritize post-fire restoration projects.

CONTEXT

Oregon experienced one of its worst fire seasons in western Oregon in close to a century with >850,000 acres burning along the Cascades in late summer 2020 that was fueled by an historic wind event. Several of these fires, notably the Riverside, Beachie, Holiday Farm and Archie burned significant acres of private industrial timber land.

The Rogue River-Siskiyou National Forest burned over 68,700 acres from two wildfires in late summer 2020 (Figure 1). The fires burned across multiple jurisdictions and land allocations (Tables 1 and 2); the Slater Fire on the Wild Rivers Ranger District started on September 8th, 2020 near the Slater Butte Fire Lookout on the Klamath National Forest (cause under investigation), while the Devil Fire was detected on September 9, 2020. The Slater Fire, which started on the Klamath National Forest, saw dramatic fire spread from the wind event, growing to nearly 100,000 acres in the first burn period.

As was seen in other fires in the Region, the fires burned at mixed severity, however, a large portion of the acres burned had high basal area mortalities as a result of the fast moving, wind driven fire event. Approximately 53% of the Slater Fire experienced >75% basal area loss (Figure 2, Table 3); of the 65,306 acres that burned on the Rogue River-Siskiyou National Forest, approximately 37% burned at >75% basal area mortality. For the Devil Fire, approximately 41% of the area experienced >75% basal area loss (Figure 3, Table 3).

Table 1. Acres burned by land ownership in the Slater and Devil Fires.

<table>
<thead>
<tr>
<th>OWNERSHIP</th>
<th>SLATER FIRE ACRES</th>
<th>DEVIL FIRE ACRES</th>
</tr>
</thead>
<tbody>
<tr>
<td>ROGUE RIVER-SISKIYOU NF</td>
<td>65,306</td>
<td>3,412</td>
</tr>
<tr>
<td>KLAMATH NF</td>
<td>50,523</td>
<td>4,901</td>
</tr>
<tr>
<td>SIX RIVERS NF</td>
<td>4,695</td>
<td>0</td>
</tr>
<tr>
<td>MEDFORD BLM</td>
<td>2,676</td>
<td>0</td>
</tr>
<tr>
<td>PRIVATE</td>
<td>3,535</td>
<td>103</td>
</tr>
<tr>
<td>TOTAL ACRES BURNED</td>
<td>126,735</td>
<td>8,416</td>
</tr>
</tbody>
</table>
Table 2. Acres of each fire by Northwest Forest Plan (NWFP) Land Use Allocations. Note that the riparian reserves double count acres as they overlay Northwest Forest Plan allocations and acreage calculations are slightly different than in Table 1.

<table>
<thead>
<tr>
<th>Fire Name</th>
<th>Total acres on Rogue River-Siskiyou National Forest</th>
<th>Wilderness (CR)</th>
<th>Administratively Withdrawn</th>
<th>Adaptive Management Area and Adaptive Management Reserved (USFS AMA)</th>
<th>Late Successional Reserve</th>
<th>NSO Core (LSR4)</th>
<th>Matrix</th>
<th>Riparian Reserves</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slater</td>
<td>62,293</td>
<td>4,991</td>
<td>430</td>
<td>0</td>
<td>28,721</td>
<td>501</td>
<td>27,650</td>
<td>14,329</td>
</tr>
<tr>
<td>Devil</td>
<td>3,412</td>
<td>3,357</td>
<td>0</td>
<td>54</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>543</td>
</tr>
<tr>
<td>Grand Total</td>
<td>65,705</td>
<td>8,348</td>
<td>430</td>
<td>54</td>
<td>28,721</td>
<td>201</td>
<td>27,650</td>
<td>14,872</td>
</tr>
</tbody>
</table>

Figure 1. Locator map for the 2020 wildfires on the Rogue River-Siskiyou National Forest.
Figure 2. Slater Fire basal area mortality map.

Table 3. Preliminary basal area loss analysis for the Slater and Devil Fires on the Rogue River-Siskiyou National Forest in 2020. Note that only the portion that burned on the Forest is reflected in the totals.

<table>
<thead>
<tr>
<th>Fires</th>
<th>&lt;25% Basal Area Mortality</th>
<th>25-50% Basal Area Mortality</th>
<th>50-75% Basal Area Mortality</th>
<th>&gt; 75% Basal Area Mortality</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Acres</td>
<td>% of fire on RRS</td>
<td>Acres</td>
<td>% of fire</td>
<td>Acres</td>
</tr>
<tr>
<td>Slater</td>
<td>27,419</td>
<td>42%</td>
<td>6,472</td>
<td>10%</td>
<td>7,004</td>
</tr>
<tr>
<td>Devil</td>
<td>2,055</td>
<td>60%</td>
<td>382</td>
<td>11%</td>
<td>358</td>
</tr>
</tbody>
</table>
FOREST SUPERVISOR – LEADERS INTENT

Forest Supervisor Merv George, Deputy Forest Supervisor Kathy Westenskow Davis, and District Ranger Scott Blower (Wild Rivers Ranger District) expressed that the Rapid Assessment Team’s work is an important step to informing their response to the fires the Forest and community have experienced. The focus of the RAT will be on the Slater Fire, given that the impacts to the Devil Fire were limited primarily to wilderness. The Forest and the District would like the RAT to consider the following, as the team moves forward and develops recommendations:

- Focus salvage on public safety needs first;
- Understand the tradeoffs and how salvage would affect forest capacity;
- High level look at loss of infrastructure;
- Recommendation on reforestation priorities;
- Considerations for keeping main road systems open and safe, considering access to the radio repeater, mining claims, utility lines and the Department of Defense’s fiber optic line.
WILDLIFE

**Northern spotted owl**
The Slater Fire burned in Northern spotted owl (NSO) critical habitat within the Klamath West unit, sub units 4, 5 and 7, while the Devil Fire did not burn in NSO critical habitat. The Slater Fire burned 39,269 acres (25%) of the Klamath West Sub Unit 4, 21,070 acres (68%) of Klamath West Sub Unit 5 and 67,285 acres (26%) of Klamath West Sub unit 7 with over 36,000 acres in critical habitat experiencing over 50% basal area mortality (Table 4 and Table 5).

Table 4. Acres of Northern Spotted Owl Critical Habitat by Sub Unit Burned on the Klamath and Rogue River-Siskiyou National Forests.

<table>
<thead>
<tr>
<th>Forest</th>
<th>Critical Habitat Sub Unit</th>
<th>Basal Area Mortality Class</th>
<th>Acres</th>
<th>Percent of Sub Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Klamath</td>
<td>Klamath West 4</td>
<td>&lt;25% BA mortality</td>
<td>7,929</td>
<td>89%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>26 - 50% BA mortality</td>
<td>104</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>51 - 75% BA mortality</td>
<td>69</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; 75% BA mortality</td>
<td>857</td>
<td>10%</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td></td>
<td><strong>8,958</strong></td>
<td></td>
</tr>
<tr>
<td>Klamath</td>
<td>Klamath West 5</td>
<td>&lt;25% BA mortality</td>
<td>13,688</td>
<td>96%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>26 - 50% BA mortality</td>
<td>261</td>
<td>2%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>51 - 75% BA mortality</td>
<td><strong>173</strong></td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; 75% BA mortality</td>
<td>182</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td></td>
<td><strong>14,304</strong></td>
<td></td>
</tr>
<tr>
<td>Klamath</td>
<td>Klamath West 7</td>
<td>&lt;25% BA mortality</td>
<td>35,800</td>
<td>56%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>26 - 50% BA mortality</td>
<td>794</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>51 - 75% BA mortality</td>
<td>1,734</td>
<td>3%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; 75% BA mortality</td>
<td>26,162</td>
<td>41%</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td></td>
<td><strong>64,490</strong></td>
<td></td>
</tr>
<tr>
<td>Rogue River-Siskiyou</td>
<td>Klamath West 4</td>
<td>&lt;25% BA mortality</td>
<td>24,830</td>
<td>82%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>26 - 50% BA mortality</td>
<td>1,334</td>
<td>4%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>51 - 75% BA mortality</td>
<td>1,201</td>
<td>4%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; 75% BA mortality</td>
<td>2,946</td>
<td>10%</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td></td>
<td><strong>30,311</strong></td>
<td></td>
</tr>
<tr>
<td>Rogue River-Siskiyou</td>
<td>Klamath West 5</td>
<td>&lt;25% BA mortality</td>
<td>5,266</td>
<td>78%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>26 - 50% BA mortality</td>
<td>545</td>
<td>8%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>51 - 75% BA mortality</td>
<td>418</td>
<td>6%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&gt; 75% BA mortality</td>
<td>537</td>
<td>8%</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td></td>
<td><strong>6,766</strong></td>
<td></td>
</tr>
<tr>
<td>Rogue River-Siskiyou</td>
<td>Klamath West 7</td>
<td>&lt;25% BA mortality</td>
<td>755</td>
<td>27%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>26 - 50% BA mortality</td>
<td>307</td>
<td>11%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>51 - 75% BA mortality</td>
<td>391</td>
<td>14%</td>
</tr>
</tbody>
</table>
Table 5. Acres of Critical Habitat Sub Units Burned in Entirety in the Slater Fire.

<table>
<thead>
<tr>
<th>Critical Habitat Unit</th>
<th>Basal Area Mortality Class</th>
<th>Acres</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Klamath West 4</td>
<td>&lt;25% BA mortality</td>
<td>32,759</td>
<td>21%</td>
</tr>
<tr>
<td></td>
<td>26 - 50% BA mortality</td>
<td>1,438</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>51 - 75% BA mortality</td>
<td>1,270</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>&gt; 75% BA mortality</td>
<td>3,803</td>
<td>2%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>39,269</td>
<td>25%</td>
</tr>
<tr>
<td>Klamath West 5</td>
<td>&lt;25% BA mortality</td>
<td>18,954</td>
<td>61%</td>
</tr>
<tr>
<td></td>
<td>26 - 50% BA mortality</td>
<td>806</td>
<td>3%</td>
</tr>
<tr>
<td></td>
<td>51 - 75% BA mortality</td>
<td>591</td>
<td>2%</td>
</tr>
<tr>
<td></td>
<td>&gt; 75% BA mortality</td>
<td>719</td>
<td>2%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>21,070</td>
<td>68%</td>
</tr>
<tr>
<td>Klamath West 7</td>
<td>&lt;25% BA mortality</td>
<td>36,555</td>
<td>14%</td>
</tr>
<tr>
<td></td>
<td>26 - 50% BA mortality</td>
<td>1,101</td>
<td>0%</td>
</tr>
<tr>
<td></td>
<td>51 - 75% BA mortality</td>
<td>2,125</td>
<td>1%</td>
</tr>
<tr>
<td></td>
<td>&gt; 75% BA mortality</td>
<td>27,504</td>
<td>11%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>67,285</td>
<td>26%</td>
</tr>
</tbody>
</table>

As a result of this changed condition, the Forest will need to have discussions with the US Fish and Wildlife Service (USFWS) regarding whether or not these changed conditions within the Klamath West Critical Habitat Unit or any of the sub units will trigger the need to reinitiate on the Upper Applegate Watershed project. Overall, per the Burned Area Emergency Response (BAER) report, the Slater and Devil Fires resulted in a downgrade of 2.6% of the suitable spotted owl habitat on the Rogue River Siskiyou National Forest (see Figure 4 below).
Figure 4. Northern Spotted Owl Critical Habitat Sub Units amount of nesting and roosting cover type acres from 1986-2020.

The Slater Fire has 20 historic NSO core use areas that had some level of suitable habitat lost at the core use area scale (approximately 500 acres, or approximately .5 mile around the nest site). Of these eight of the core use areas fell below the 50% threshold for suitable habitat and this combined with the pre fire conditions resulted in all 20 of the historic core use areas now being below 50% suitable habitat. In particular, NSO sites 36, 44, 218, 319 and 4203 will not likely be suitable owl habitat for decades as the majority of their core use areas burned at >90% basal area mortality. Additionally there are five LSR4’s (historic NSO nest sites) within the fire perimeter, and these burned owl cores present an opportunity to accelerate forest recovery and should be considered for some level of reforestation.

Figure 5. Pre and post fire nesting, roosting cover types within the Slater Fire perimeter. Data derived from Ray Davis and Andy Stratton’s Google Earth Engine cover type tool.
Ray Davis will be providing updated post fire spotted owl habitat layers for the Forest to use in current and future planning efforts, currently there is a visualization tool developed from which images in Figure 4 and 5 above were created, and that can be accessed here: https://usfs.earthengine.app/view/nso-cts-trends-v2.

**Coastal Marten**

The range of the coastal marten extends into the western portion of the Slater Fire. Overall, the Slater Fire has 6,961 acres of the California/Oregon extant population area (EPA), with high severity fire occurring on approximately 3,578 acres of habitat, 902 acres of which are on the Rogue River-Siskiyou NF. The areas burned at high severity will not become marten habitat until a shrub layer establishes post fire to provide them some cover for dispersing. Marten are very susceptible to predation by large raptors and larger mesocarnivore generalists like bobcat, coyotes and wolves, and they avoid areas with a lack of cover. The forest will need to update their habitat baseline for this species as a result of the Slater Fire.

**Marbled Murrelet**

There was no marbled murrelet critical habitat within the fire perimeters, though there are two units, CA-01-d and CA-01-e that are directly adjacent to the fire on the Klamath NF. There was limited murrelet habitat on the Wild Rivers portion of the Slater Fire which falls within 50 miles of the coast. The Devil Fire was too far east to occur in potential murrelet habitat. Limited information was available regarding murrelet occupancy per fire, however, like NSO, areas with greater than 50% basal area mortality are likely no longer suitable habitat for nesting murrelets. The Forest will need to work on updating the murrelet habitat baseline as a result of the Slater Fire.

**Wildlife Habitat Restoration Opportunities**

While the majority of the high severity fire occurred on the Klamath NF portion of the Slater Fire, there is still significant patches of >90% basal area mortality present on the Rogue River-Siskiyou NF. These areas will likely remain as early seral habitat for over a decade, and likely make these high severity patches susceptible to invasive weed expansion on the Forest. As this area is also suitable habitat for a variety of pollinator species, including the Franklin’s bumble bee (which is proposed for listing under the Endangered Species Act (ESA) as “endangered”), the Western bumble bee (which is currently being reviewed for ESA listing) and the monarch butterfly (which is also being reviewed for ESA listing). To complement the prescribed early detection rapid response treatments proposed by the BAER team, there is an opportunity to consider more extensive seeding of native grasses palatable for big game, as well as seeding of native and genetically appropriate flowers and forbs that could provide improved nectar and pollen sources for these and other pollinator species. This seeding would not only aid in improving habitat conditions for wildlife species, it would also be beneficial to retain remaining soil in the severely burned areas. The Oregon Department of Fish and Wildlife (ODFW) is very interested in supporting National Forests in Oregon in post-fire recovery, so consider engaging the local Rogue District biologists for habitat restoration assistance.

**Snags and Downed Wood**

Over the past 20 years, 56% of the Rogue River-Siskiyou’s Wild Rivers, Siskiyou Mountain and Gold Beach Ranger Districts have burned, with some of those experiencing multiple wildfires over the same footprint. Less than 1% of these past fires have been salvaged, with the majority of snag loss occurring along roadsides as danger tree mitigation to keep open public access. Therefore, snag abundance at the landscape level will likely be above the 80% tolerance level on the Wild Rivers and Siskiyou Mountain Ranger Districts for quite some time. Due to the severity of the Slater Fire in particular, it would be
beneficial to leave some larger diameter (>20”) logs within potential roadside danger tree and potential salvage units (if pursued) to meet downed wood retention levels, because much of the pre-fire downed wood was consumed. The Region will provide an updated snag and downed wood layer for use in future project DecAID analyses to help inform current and future vegetation management project planning; please reach out to Josh Chapman for that information.

**SOILS, HYDROLOGY AND FISHERIES**

The Slater Fire primarily burned the East Fork Illinois watershed, which includes the Sucker Creek, Dunn Creek and Althouse Creek subwatersheds. Portions of the West Fork Illinois River watershed were also affected. Refer to the Slater BAER 2500-8 report for background information including area, soil, geology description as well as acres of burn severity by subwatershed. Fires, suppression activities, and other post-fire actions including hazard tree reduction and salvage have potential to affect soil, water and fisheries resources including water quality, aquatics and ESA-listed fish.

Watersheds recently burned by wildfires are susceptible to increased erosion and debris flow occurrence. The likelihood of debris flows decreases over time as vegetative cover and soil infiltration functioning return to pre-fire conditions. There is some evidence, however, that there is still an elevated debris flow susceptibility risk in burned forested areas largely attributable to the fire-induced tree mortality and subsequent decay of tree root networks decreasing soil strength on steep hillslopes which produces an increased likelihood of debris flow occurrence for ten or more years after the wildfire. Entrainment of wood by debris flows reduces momentum and may shorten runout lengths of flows. Anticipate changes to water quality from solar loading and nutrient increases due to loss of riparian cover and erosion. While many variables determine water quality response to fires, some streams in the Slater Fire will have increased solar loading and elevated stream temperatures with larger daily fluctuations. There may also be changes in water quality parameters typically dependent on temperature such as pH and in some instances dissolved oxygen. Sediment levels may increase in some streams.

The Rogue River Total Maximum Daily Load (TMDL) was approved by the EPA in 2008 but is part of the Temperature TMDL Replacement effort ongoing in Oregon. Per the District Court’s final order and judgement, DEQ must amend and submit a replaced temperature TMDL to EPA for approval or disapproval. This TMDL is scheduled to be replaced by April 17th, 2026. Additionally, DEQ is updating the following Upper and Lower Sucker TMDLs for temperature. There will be a need to coordinate with the state effort and provide requested updates to reflect changed conditions as well as update any existing WQRP completed by the forest.

The East Fork Illinois River is a drinking water source area for city of Cave Junction (PSW-ID OR4100971). Fires have the potential to affect drinking water supplies where larger areas burned in higher severity and in closer proximity to intakes. If warranted a more detailed analysis may be needed to determine potential impact to the drinking water system.

**Recommendations:**

- Avoid removal of standing trees and large woody material in debris flow prone areas dependent on the values-at-risk. Entrainment of wood by debris flows reduces momentum and may shorten runout lengths of flows.
- Retain standing trees with potential to fall into stream channels or fall standing dead trees into adjacent streams where wood has been removed or burned.
o Where possible, focus revegetation efforts in riparian areas and unstable areas, to reduce erosion rates and provide for future recruitment of LWD and to provide shade.

o Consider the Travel Management Plan (TMP) and other existing planning recommendations in the post-fire transportation system management. Also consider existing infrastructure in making these determinations. For example, if the TMP designated a road be decommissioned, removal of danger trees may be necessary to provide for access to remove long-term risks on the landscape such as culverts and fill.

o Inventory infrastructure values-at-risk and stormproof where needed utilizing cross drains, waterbars, and rolling dips; upsizing culverts.

o The Forest’s wet-weather operating standards for roads should be reviewed in light of the current conditions and emphasized, as appropriate, during any post-fire management activities.

o Continue working with USGS, state, local entities and regional office to monitor effects to water quality. Provide appropriate BMPs and mitigation measures to protect water quality during any proposed management activities.

o Consider directing some large wood to future stream habitat restoration projects throughout the Forest or on other Federal or private lands working through partnerships and other authorities such as the Good Neighbor Authority.

REFORESTATION

Reforestation is more than tree planting. Reforestation efforts generally are a continuum that might range from 100% natural regeneration to 100% planting, depending on the land management objectives and seed source availability.

The most basic role of a silviculturist, per the National Forest Management Act (NFMA), is to identify the species composition, stocking level, growth rate and other stand conditions needed to meet the land management direction. When our emphasis was more on single-species management in the past and our reforestation was primarily harvest-based, these items were commonly reduced to just the stocking level without much attention (if any) to species composition or other stand conditions. The point here is that while stocking is important, it should no longer be the sole measure of reforestation success.

General Regional Priorities for Reforestation

The Regional Forester is responsible for setting general priorities for reforestation; his letter of direction was signed in 2018 and was re-sent to Forest Silviculturists recently. Our highest priority in the region is reestablishment of disease-resistant five-needle pines (western white, sugar, whitebark) and Port-Orford-cedar that have been impacted by mortality from invasive diseases. Their restoration is important for ecosystem resilience to disturbance and climate change and for ecosystem function. In some cases, these may be the only species that we plant because natural regeneration will be appropriate for the other tree species. The letter includes other general priorities and details of national policy on reforestation after disturbance and salvage.

Post-Disturbance Reforestation Assessment

Forest Service Policy requires a post-disturbance reforestation assessment. This is a living document that is modified as additional site-specific information becomes available. The initial assessment for a large fire is usually based on remote sensing information to quickly identify whether there is a reforestation need or not, and if that need will be met through planting, natural regeneration, or natural recovery. The NFMA requires us to report acres of reforestation need annually to Congress, so this initial assessment is very important to have some estimate of reforestation need at the end of the fiscal
year. Areas stay in the FACTS database as a reforestation need until they are certified as satisfactorily reforested.

Because the Slater Fire is still uncontained, the Rogue River-Siskiyou NF has not had time to complete an initial post-disturbance reforestation assessment. As part of the Rapid Assessment process, we have generated a draft reforestation assessment for the Slater Fire based on % basal area mortality, potential available seed source for natural regeneration, and land allocation.

Based on that “quick and dirty” assessment, an initial estimate of reforestation need that can be entered into FACTS for FY20 reporting purposes. These needs include:

- Natural Recovery ~13,000 acres
- Natural Regeneration ~ 6,000 acres
- Planting ~ 2,000 acres

Due to warmer winters recently, we have seen additional over-winter mortality of fire-affected trees. The forest will want to consider contacting Craig Baker at GTAC to get an additional RAVG analysis completed after full spring leaf-out to see if additional areas need to be considered for reforestation activities.

JH Stone Nursery is still accepting sowing requests for both container and bareroot stock sowing for FY21 even though the preferred due date was November 1st. If you wish to place a request for FY21 sowing (for seedlings to be planted in FY22 or later), contact the nursery to make sure they can accommodate your request. If they can, submit a sowing request to the RO (Robyn Darbyshire) for approval.

For climate change considerations for reforestation, the western US has already warmed by 2 degrees F (https://apps.fs.usda.gov/gtac-toolsms/tca/). Flash droughts in recent years have resulted in changed conifer growth patterns in southwestern Oregon and other locations, as well as increased levels of tree dieback and mortality across the “westside” of Region 6. Species composition and stocking level are important ways to increase resilience to these conditions. Forest Service geneticists can also provide advice on movement of seed from hotter, drier areas to areas on the Slater Fire in need of planting. The Climate Change Vulnerability Assessment for the Rogue River-Siskiyou NF shows areas where there is more (or less) agreement about future vegetation change. This information can be used to determine where to focus adaptation efforts.

**Policy on Preparation of Silvicultural Diagnoses and Prescriptions**

The post-disturbance reforestation assessment serves as a silvicultural diagnosis and, per agency policy, must be prepared or approved by a Forest Service Certified Silviculturist. Policy also requires that site-specific reforestation prescriptions be prepared or approved by a Forest Service Certified Silviculturist. Regardless of the purpose of the planting, a silviculturist can help resource specialists identify the appropriate seed source, stock type, and other specifications for planting to meet the project objectives. Reforestation is a multi-step process that involves living materials that can easily have their survival potential reduced due to improper handling or planting. Larger planting programs of any type require continuous risk management decision-making to ensure maximum survival and growth of planted trees.

**Riparian Planting**
Special attention may be needed for adequate genetic diversity in riparian planting. Some riparian hardwoods reproduce clonally by plant parts that travel downstream. In some cases, the genetic diversity of hardwood trees may be very narrow, so if these trees are used for seed collection or cutting collection, the new plantings will not have sufficient genetic diversity. The Area Geneticist or local silviculturist can help ensure that hardwood plantings have adequate genetic diversity.

**Partnerships**
Partnerships are a key part of post-disturbance reforestation in Region 6. Forests that use regionally-managed post-disturbance reforestation funds are required to submit reforestation partnership proposals to help leverage additional funds to cover the cost of tree seedlings. Region 6 has been very successful in getting projects funded, and we are recognized by the WO for our riparian restoration proposals and other specialized reforestation projects. The region received $1.1 million in partnership funds in FY20 and 100% of our proposals were funded. We expect to receive at least that much in FY21, depending on the value of the proposals that we submit.

**Trillion Tree Initiative**
On January 20, 2020, the President announced that the United States would be joining the World Economic Forum Trillion Tree Initiative to grow and conserve one trillion trees worldwide by 2030. On October 13, 2020, the President signed an Executive Order that established an Interagency Council to help advance the initiative. The focus of this initiative is the ability of reforestation to sequester carbon as a natural climate solution that provides additional benefits like wildlife habitat, watershed protection, and wood products. There is no additional funding for this at this time, but several bills have been introduced in Congress that would provide some additional funding. In some bills that additional funding is aimed at reducing the Forest Service “reforestation backlog”, while other bills focus on carbon sequestration and forest management practices to conserve trees.

**Prioritization of Seed/Seedlings to Address Reforestation Needs from the 2020 Wildfires**
Based on remote sensing, approximately 500,000 acres of Forest Service managed land was burned by wildfires in 2020 in Region 6. Of that, approximately 200,000 acres have at least 75% of the basal area killed by fire. Due to the conditions under which the fires burned, this is a greater proportion of 75% basal area mortality than we usually see. That 200,000 acres will more than double our existing reforestation needs in the region and will put a strain on seed or seedling availability for some forests.

If the Forest needs additional seed or seedlings to meet high priority tree planting needs, the Area Geneticists are developing a tool to identify transfer limits for all Region 6 Forest Service Seed Lots. The Regional Geneticist has also developed agreements with other forest land management agencies to use or purchase their seed. The Forest should work with their Area Geneticist, Scott Kolpak, to identify other potential seed sources and work with the National Forests or other entities that have that seed to use it on the Rogue River-Siskiyou NF. If prioritization of seedlings is needed, the Regional Silviculturist can help facilitate that process.

**Planting of Unsalvaged Areas with Standing Dead Trees**
The most common situation in Region 6 where we plant unsalvaged areas is where managed stands have burned and the trees are not large enough to salvage profitably. Many forests have also planted trees under larger standing dead trees. Safety of employees and contractors is of high importance, and this can be dealt with through a Job Hazard Analysis/Risk Assessment and/or selective felling of dead trees to create safer places to plant and to conduct follow-up surveys. Earlier efforts to plant under larger standing dead trees in the region often run into overriding safety issues due to deterioration of
the dead trees if planting is delayed more than 3-4 years or when it is time to do post-planting stocking surveys. In the case of stocking surveys, this can potentially be addressed through the use of UAS (drones). Any non-salvaged areas to be planted should be a high priority for planting.

**Protection of the Planting Investment**
Tree planting is very expensive when you consider the cost of cone surveys, cone collection, seedlings, pre-planting surveys, contract preparation, contract administration, planting costs, and survey costs. With the increasing frequency of reburns in the region, it is important to consider live and dead fuel management at the landscape and at the stand scale to help assure that at least some of the planted trees can survive the next fire. Wider/irregular spacing of planted tree seedlings, rearrangement of fuels, and early use of prescribed burning can help at the stand scale.

**Regional-level NEPA Analysis for Tree Planting**
The Regional Aquatic Restoration EA, which had its decision signed in early 2020, can be used to cover any planting activities in riparian areas.

**RECREATION, SCENIC RESOURCES, AND WILDERNESS**

The Slater Fire impacted a number of recreation resources and opportunities on the Rogue River-Siskiyou National Forest that are of particular importance to the local community. The fire impacted trails, facilities and a popular lookout. Affected infrastructure include a campground, a popular SnoPark, trailheads, and a number of trails. The Forest’s portal sign was also destroyed.

Shifts in patterns and intensity of recreation use are likely to occur, at least in the short-term. Recreation infrastructure and sites lost due to fires (and/or site or area closures) will result in a reduced supply of recreation opportunities and settings. The treatments proposed by the BAER team, if fully funded, will mitigate hazards, protect infrastructure from additional damage, protect the public and provide for worker safety. The use of temporary closures and hazard signs will inform users of known and potential hazards in the burned area.

Two critical losses of recreation resources are notable impacts. The Bolan Mountain Lookout, listed on the National Historic Lookout Registry, was at 100% occupancy during the open season and a brand new Romtec toilet had been installed in August of 2020. The Lookout was a total loss and the new Romtec toilet sustained heat damage and some scorching of the wood trim and eves. The Page Mountain Sno-Park suffered extensive damage, with total destruction of the warming shelter and storage shelter. A large number of hazard trees will need to be felled. The Sno-Park is a critical winter recreation asset for both Cave Junction and Grants Pass, as it is the only Sno-Park in Josephine County and is funded by the State of Oregon for the Oregon Department of Transportation to conduct snow removal in the winter. Users of this site participate in snow shoeing, cross country skiing, and snowmobiling, with the most common use being the tube hill. It would be difficult, if not impossible for the Forest to keep users out of this site, even if gated.

In collaboration with and support from the Regional Office¹, the Forest will need to seek opportunities to replace lost recreation infrastructure, and developed recreation site amenities (toilets, signage, signage, signage).

¹ The Agency is undertaking a comprehensive, holistic approach to management of available funding sources to maintain, restore and improve its physical infrastructure and assets. Submittal of all infrastructure projects in FY 21
tables, fire rings) in locations where decision are made to replace in kind. Similarly, in collaboration with and support from the Regional Office, seek resources to do more trail repair, restoration, slope stabilization, and trail bed armoring. Where conditions warrant considerations of relocated portions of trail or creating new segments of trail to access existing trail networks not affected by fire, keep in mind opportunities for creating more miles of sustainable trail that meet Forest Service Trails Accessibility Guidelines.

**Developed Recreation Sites**

Actions in developed recreation sites (Table 6) should prioritize immediate health and safety issues, including hazard tree/danger trees, hazmat cleanup/remediation, and site security; the BAER effort will mitigate many of the immediate hazards created by the fire. The affected sites are important to the local area. The Forest has a high desire to ensure that recreation opportunities are restored to this area.

**Table 6: Developed recreation sites affected by the Slater Fire.**

<table>
<thead>
<tr>
<th>Site Type</th>
<th>Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>TH</td>
<td>Bolan Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Page Mountain Bicycle Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>East Fork Illinois Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Sanger Peak Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Osgood Ditch Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Crazy Peak Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Black Butte Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Sanger Creek Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Kings Saddle Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Tanner Lake Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Boundary Trailhead</td>
</tr>
<tr>
<td>TH</td>
<td>Sucker Creek-Illinois Valley Trailhead</td>
</tr>
<tr>
<td>CG</td>
<td>Bolan Lake CG</td>
</tr>
<tr>
<td>RR</td>
<td>Bolan Mountain Lookout</td>
</tr>
<tr>
<td>DU</td>
<td>Page Mountain Sno-Park</td>
</tr>
</tbody>
</table>

**Wilderness**

Nearly 5,000 acres of designated wilderness were affected by the Slater Fire (Table 7). Given limited resources, prioritize repair efforts for trails leading into wilderness areas and trails with substantial trailhead infrastructure. Look for opportunities to partner with local groups and partners to help with wilderness appropriate projects.

For trails in wilderness, prior to reconstructing impacted trails, consider whether the trail’s location is sustainable in terms of frequency/cost of maintenance, ability to maintain with non-motorized equipment and non-mechanical transport, and its contribution to wilderness character (See FSM for the Comprehensive Capital Improvement Plan (CCIP), the Great American Outdoors Act (GAOA) - National Parks and Public Land Legacy Restoration Fund program and the Federal Land Transportation Program (FLTP) is now consolidated through one portal as part of the newly named National Asset Management Program (NAMP).
2323.23(f)). A Minimum Requirements Analysis, documented through a Minimum Requirements Decision Guide (MRDG), should be completed if any use of motorized equipment or mechanical transport is considered.

Inform visitors of potential hazards through websites, signs at trailheads, and targeted outreach to hunters through ODFW. Hazard tree abatement may be needed at trailheads (outside of wilderness).

Table 7: Acres of Wilderness areas affected by the Slater Fire.

<table>
<thead>
<tr>
<th>WILDERNESS NAME</th>
<th>0% BA mortality</th>
<th>1 - 10% BA mortality</th>
<th>11 - 25% BA mortality</th>
<th>26 - 50% BA mortality</th>
<th>51 - 75% BA mortality</th>
<th>76 - 90% BA mortality</th>
<th>91 - 100% BA mortality</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Red Buttes</td>
<td>1,102</td>
<td>48</td>
<td>73</td>
<td>125</td>
<td>101</td>
<td>54</td>
<td>68</td>
<td>1,570</td>
</tr>
<tr>
<td>Siskiyou</td>
<td>1,206</td>
<td>108</td>
<td>195</td>
<td>400</td>
<td>479</td>
<td>285</td>
<td>728</td>
<td>3,401</td>
</tr>
<tr>
<td>Grand Total</td>
<td>2,308</td>
<td>156</td>
<td>268</td>
<td>525</td>
<td>580</td>
<td>339</td>
<td>796</td>
<td>4,971</td>
</tr>
</tbody>
</table>

**Trails**

Almost 24 miles of trails were affected by the Slater Fire (Table 8); of those miles, about 6 miles of trail, primarily designated as pack and saddle trails burned at greater than 50% basal area mortality. One motorized trail, the Page Mountain Bicycle Trail, was also impacted.

In the short-term, the Forest may need to consider investing in trail maintenance and improvement in areas not impacted by fire in the near term to satisfy demand for trail experiences until landscape and trail networks in areas affected by the fire have stabilized and revegetation has started to occur, etc.

Consider opportunities to work with other recreation providers and partners to address increases in trail maintenance for those affected trails with the greatest use and sustained demand in settings with less intensity of fire severity or extent.

Table 8: Miles Non-Motorized Trails Affected by the Slater Fire.

<table>
<thead>
<tr>
<th>Slater Fire Miles of Non-Motorized Trail w/in Fire Boundary</th>
<th>Miles Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Designed Use</td>
<td></td>
</tr>
<tr>
<td>HIKE - HIKER/PEDESTRIAN</td>
<td>0.3</td>
</tr>
<tr>
<td>PACK - PACK AND SADDLE</td>
<td>23.5</td>
</tr>
<tr>
<td>Grand Total</td>
<td>23.8</td>
</tr>
</tbody>
</table>

**Wild & Scenic Rivers**

There were no Wild and Scenic Rivers on the Rogue River-Siskiyou National Forest affected by the Slater Fire.

**Visual Quality/Scenic Character**

Fire suppression efforts may have created noticeable visual impacts to valued natural appearing settings (such as high stumps from hazard-danger tree removals and such). Where it is not already accounted for through BAER or other means, efforts are needed to identify funding and resources to address suppression repair and roadside danger tree removal mitigation in areas with visual quality objectives (VQOs) of preservation, retention and perhaps partial retention, following guidelines outlined by Forest Landscape Architect-Recreation Program Manager.
If considering salvage opportunities, consider the location and extent of where salvage may be occurring on lands bordering Forest Service managed lands to minimize potential for unnatural lines or patterns on the landscape. This would include danger tree removals associated with utility line corridors, which is likely to increase the visibility of unnatural patterns on the landscape.

Fire suppression activity and danger tree removals have likely created an existing condition that does not meet visual quality objectives. This may result in more difficulty with meeting Forest Plan standards for visual quality for any proposed salvage activities. An assumption is that even more of the view shed is visible now as well and will be more visible because of high severity fire that has removed the canopy layer that might have previously screened areas beyond the foreground from view. Consult with the Regional Office if assistance is needed to address visual quality in key areas.

**INVENTORIED ROADLESS AREAS**

The 2001 Roadless Area Conservation Rule (RACR) established protection for inventoried roadless areas (IRAs); the rule generally prohibits road construction and timber harvest, with some exceptions that require review by the Regional Forester. Two IRAs were minorly impacted by the Slater Fire: the Kangaroo IRA (7,031 acres on the Siskiyou side), which is adjacent to the Red Buttes Wilderness, only had 6 acres burn with greater than 50% basal area mortality; and the Siskiyou IRA (3,034 acres), which is adjacent to the Siskiyou Wilderness, saw about 179 acres burn at greater than 50% basal area mortality. About 17 acres of the Kangaroo IRA (5,370 acres on the Rogue River side) were impacted by the Devil Fire, with only 1 acre burned at >50% basal area mortality.

Appendix C of the Final Environmental Impact Statement for the Rogue River-Siskiyou National Forest Land and Resource Management Plan describes the special features of the roadless areas. Recreation uses include hiking, fishing and hunting in the Siskiyou IRA, and hunting and hiking in the Kangaroo IRA, with the motorized Boundary Trail of notable use.

Timber may not be cut, sold or removed in IRAs, except as described in the regulation at 36 CFR 294.13(b). In general, timber cutting must be infrequent, generally small diameter, and must be needed to maintain or improve one or more of the nine roadless area characteristics as defined by the roadless rule. In addition, timber can only be cut if needed to improve TES habitat; to maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes.

Given the relatively minor impacts to the IRA, it is recommended that the Forest avoid tree cutting activities unless needed to protect human life and safety at a developed or dispersed recreation site, or to address hazards along the Boundary Trail. Any proposal to cut timber in an IRA needs to be reviewed by the Regional Forester prior to undertaking the activity.

**CULTURAL/HERITAGE RESOURCES**

Adverse impacts to cultural/heritage resources occurred as a result of the Slater Fire. According to the Forest, the cultural setting for the Slater Fire is both rich and complex. Native American groups have inhabited the area for at least 10,000 years. The gold rush brought a major influx of Euro-Americans to the area, with the mining towns of Waldo, Althouse, Brownstown and Kerbyville rapidly appearing, then disappearing as soon as the gold was depleted. The Great Depression brought the Civilian Conservation
Corps (CCC) to the area, with crews constructing the Grayback Road, campsites, administrative buildings, fire lookouts and other infrastructure in the area.

The Forest staff is fully occupied with their regular program of work. The pandemic has limited the ability to hire temporary employees and has also affected consultation timelines for both SHPO and affected Tribes. Any additional work identified post-BAER will need to result in an adjustment of priorities by forest personnel and/or additional qualified personnel will be needed to address any area salvage, restoration and additional danger/hazard tree felling and salvage. If significant additional heritage clearance is needed for restoration or salvage activities, the Forest may need to do one or more emergency hire actions or contract through the local IDIQ, regional BPA or Forest Service Enterprise program to be able to meet the needs. If the decision is to pursue area salvage in addition to a green program, Forest heritage resources would be severely taxed.

**LANDS**

Approximately 170 miles of boundary lines exist within the Slater Fire perimeter, and include boundaries with the Coos District BLM, Medford District BLM and private lands. The degree of damage to boundary markers is unknown at this time and the Region 6 Lands Zone will assess the damage. Any salvage units that are located near the boundary need to be assessed for boundary line work prior to layout to ensure that the NFS boundary has been appropriately delineated.

A little over 7 miles of powerlines managed by PacifiCorp were affected by the fire. Approximately 6 miles powerline burned with greater than 50% basal area mortality. PacifiCorp is currently working on falling and decking danger trees under emergency authority; work is expected to continue over the winter.

The Department of Defense maintains a fiber optic line in the area; this critical resource was not burned, but important reference markers were damaged. Any work near the location of the line will require coordination with the Department. Maintaining access for the Department is a very high priority.

**ROADS**

The Slater Fire contains approximately 237 miles of NFS roads are within the fire area of which about 40.5 miles are currently closed (Table 9). After the BAER treatments and danger tree treatments are completed, additional road work, including danger tree falling, will be needed for post-fire repair/restoration. Throughout the road systems the Forest expects to see an increase in rock fall, debris flows, and down trees. Other anticipated treatments include installation of hazard signs, emergency road closure, storm inspection and response, continued road maintenance from rock fall/debris and upsizing some culverts.

<table>
<thead>
<tr>
<th>Slater Fire Roads</th>
<th>Low Basal Area Mortality</th>
<th>Moderate Basal Area Mortality</th>
<th>High Basal Area Mortality &gt;75%</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 - BASIC CUSTODIAL CARE (CLOSED)</td>
<td>24.85</td>
<td>4.2</td>
<td>11.4</td>
<td>40.5</td>
</tr>
<tr>
<td>2 - HIGH CLEARANCE VEHICLES</td>
<td>97.8</td>
<td>21.5</td>
<td>65.7</td>
<td>185</td>
</tr>
</tbody>
</table>

Table 9. Miles of roads by basal area mortality.
Slater Fire Roads | Low Basal Area Mortality < 50% | Moderate Basal Area Mortality 51-75% | High Basal Area Mortality >75% | Grand Total  
--- | --- | --- | --- | ---  
3 - SUITABLE FOR PASSENGER CARS | 3.3 | 0.5 | 7.2 | 10.9  
4 - MODERATE DEGREE OF USER COMFORT | 0 | 0 | 0 | 0  
5 - HIGH DEGREE OF USER COMFORT | 0.9 | 0.18 | 0.61 | .88  
**Grand Total** | **126.85** | **26.38** | **84.91** | **237.28**

**Road Prioritization Post-fire**

During suppression and with the proposed blanket purchase agreement (BPA) on the Slater Fire, danger tree treatments along some high priority roads have started. This BPA covers the 48 Road including the unpaved piece that extends to the Bolan Mountain Lookout. The Forest is still in the process of evaluating and treating other roads; these roads are currently being prioritized by the Forest.

For the roads not addressed during suppression, BAER or with the BPA, it is recommended that the Forest develop a process that includes how they will work within current budget and workforce realities to prioritize roads for danger tree abatement; this process should also include criteria for determining whether or not those danger trees will be removed or retained. Prioritization of road systems for treatment of danger trees is covered under the FSM R6 supplement 7730-2007-2 and should also consider decisions made through Travel Management Planning and the current Motor Vehicle Use Map (MVUM). Although addressing danger trees along roads can be covered as part of routine maintenance, the Forest will need to address consultation and seasonal restrictions, such as those that apply for the northern spotted owl.

**Recommended prioritization criteria:**

1. Arterials and collectors should be the highest priority using the following hierarchy:
   a. Long-duration exposure areas like vistas, pullouts, or other places where people are encouraged to stop or any other place where people are exposed for more than 15 minutes. Additionally, places where work activity occurs post-fire for a long duration of time, like culvert replacement or repair, or other road maintenance activities. Some of these high priority areas may have been taken care of with BAER, however, this will require good tracking efforts so high priority areas are not missed or overlooked.
   b. Short-duration exposure areas, like intersections or places where the exposure is up to 15 minutes, such as stop signs. Some of these high priority areas may have been taken care of with BAER, however, this will require good tracking efforts so high priority areas are not missed or overlooked.
   c. Intermittent but high frequency exposure, like high traffic roads for public commuters, timber haul routes, or limited site distance areas (sharp corners).
   d. Stratification of roads based on identified roadside fuel breaks is also recommended. Roads that can provide logical fuel breaks should be considered for higher priority designation than those with lesser fuel break potential.
   e. Areas with low traffic volumes.
   f. Within this framework, areas with higher basal area mortality levels should be considered for treatment above areas that could be more easily handled through time.
2. All open roads from the current MVUM in the fire area, regardless of maintenance level, should be prioritized and included in the plan for treatment. Roads that have been permanently closed should not be considered for treatment.

3. Road maintenance level should not be used as the sole means of prioritization due to past adjustments of road maintenance levels based upon budget restrictions. Instead, prioritize based on above hierarchy, in consultation with wildlife and aquatic specialists as described previously.

4. Close high priority roads where danger trees cannot be mitigated. Use the closure order process recently finalized by RO.

**Recommendations for danger and hazard tree abatement in LSR**

For danger and hazard tree removal along roadways and in developed recreation sites within the LSR, the NWFP standards and guidelines do allow for tree felling. If felled trees are left on-site, a DecAid analysis is not needed. If the trees will be sold, an updated DecAid analysis is required (see previous discussion under wildlife regarding snags and down wood). The sale and removal of these materials is limited by the following:

- For snags and logs located in campgrounds and on roads, the material can be removed and sold, where appropriate.
- Along roads and trails, the following applies: where there is a deficit of large woody material (LWM), danger/hazard snags can be felled, but must be left on site. In areas where there is not a deficit of LWM, there is slightly more latitude, though retaining the material on site should be considered, unless retaining the material would be considered a safety issue or would contribute to excess fuel loads that would present a fire hazard.

**Categorical Exclusions for Hazard Trees at Trailheads**

Routine hazard tree mitigation at trail heads may be authorized under the repair and maintenance of recreation sites and facilities categorical exclusion (CE). Although routine hazard tree mitigation is covered under this CE, the Forest still needs to address consultation and seasonal restrictions, such as for northern spotted owl for felling and/or removal of hazard trees.

**Hazard Trees in Developed Recreation Sites**

Hazard trees in recreation sites and developed sites should be assessed following the guidelines provided in the *Field Guide for Hazard-Tree Identification and Mitigation on Developed Sites in Oregon and Washington Forests*. This includes the roads and trails within the perimeter of the developed sites. Trees along roads leading up to recreation sites and developed sites should be evaluated using *Field Guide for Danger-Tree Identification and Response along Forest Roads and Work Sites in Oregon and Washington* (Filip et al. 2016).

Many recreation sites experienced a stand replacing fire. Filip et al. (2014) identifies dead trees as having a high potential for failure. Trees in these recreation sites that are dead will need to be mitigated before sites can be considered for opening. Due to the large number of trees impacted it is recommended that these sites be prioritized for treatment.

**Probability of Tree Mortality**

Because tree mortality in burned areas is often delayed post-fire (Filip et al. 2007) some type of prediction of which trees may die post-fire is often desired to avoid multiple salvage entries. Post-fire marking guidelines have recently been developed specifically for Oregon and Washington and represent a compellation of the most recent scientific information on potential tree mortality following fires. The

TIMBER

The Slater Fire burned in one planning area that the Forest had conducted pre-planning surveys and analysis. The Riverhouse Planning Area was substantially affected by fire activity, with impacts ranging from complete stand replacing fire to more of a mosaic of effects. The Forest had invested in stand exams in the area, which will still provide useful information for the Forest. Only the portion near the Oregon Caves National Monument was unburned.

**Removal of Suppression Decks**

Log decks created during suppression and suppression repair can be removed under emergency suppression activities (36 CFR 220.4(b)). Removal of suppression decks should be done as soon as possible to ensure safe operations and adequate space to facilitate additional material to be decked and removed. The Forest should document their rationale for needing to remove the log decks in an expedited manner. A “letter to the file” (file codes 5100/2430), signed by the District Ranger or Forest Supervisor is adequate documentation. Once the letter is signed proceed to Gate 1. Appraisals must address both timber property value and for Oregon and California (O&C) Railroad lands, stumpage distribution requirements must be included. Consider the 2400-2 contract forms as the primary form for deck sales. Utilize a 2400-3, 4, or 6 where necessary to ensure protection of resources and distribution of funds.

To expedite the removal of decked material, one advertisement may be used for multiple sales. Consider posting or mailing a “pre-advertisement” notice to inform potential bidders of upcoming sales. Sales may be advertised for 14 days due to the emergency need to move the wood for suppression repair. It is recommended to keep mandatory deposits on brush disposal and road maintenance at the minimum required for the work. Purchaser performance for road maintenance is preferred. Due to limited access, a system of authorization or escorting potential bidders may be necessary during the advertisement period.

**Awarded Timber Sale and Stewardship Contracts**

There were no awarded timber sales or stewardship contracts affected by the Slater Fire.

**General Area Salvage Considerations (if warranted)**

Prioritize areas with greater than 50% basal area mortality (secondarily those with 25-50% mortality) and trees with inside bark diameter (DIB) of >10” or diameter at breast height (DBH) of >16” to maximize potential value and longevity of the material. Experience from previous salvage efforts indicates that smaller diameter material will quickly deteriorate and show checking and insect damage within 2-3 months. Table 10 shows the distribution of matrix within and outside of O&C lands with associated BA mortality.
Table 10: Matrix land within the Slater Fire perimeter and associated BA mortality in O&C lands and outside O&C lands.

<table>
<thead>
<tr>
<th>BA Mortality in Matrix Allocation within Slater Fire</th>
<th>Outside O&amp;C Lands</th>
<th>O&amp;C Lands</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>0% BA mortality</td>
<td>7,584</td>
<td>2,734</td>
<td>20,465</td>
</tr>
<tr>
<td>1 - 10% BA mortality</td>
<td>586</td>
<td>250</td>
<td></td>
</tr>
<tr>
<td>11 - 25% BA mortality</td>
<td>1,012</td>
<td>446</td>
<td></td>
</tr>
<tr>
<td>26 - 50% BA mortality</td>
<td>1,780</td>
<td>799</td>
<td></td>
</tr>
<tr>
<td>51 - 75% BA mortality</td>
<td>1,746</td>
<td>765</td>
<td></td>
</tr>
<tr>
<td>76 - 90% BA mortality</td>
<td>1,135</td>
<td>474</td>
<td></td>
</tr>
<tr>
<td>91 - 100% BA mortality</td>
<td>6,621</td>
<td>1,718</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>20,465</strong></td>
<td><strong>7,185</strong></td>
<td><strong>27,650</strong></td>
</tr>
</tbody>
</table>

Oregon and California Railroad Grant Lands

After years of argument over management authority for Oregon and California Railroad (O&C) grant lands between Agencies, the Cordon-Ellsworth Act of 1954 (43 US Code 1181g) provided that the O&C Lands within the boundaries of the NFS would be managed as O&C Lands by the Forest Service. The Act stated that these lands would be managed as National Forest System lands, subject to all laws, rules, and regulations applicable to the national forests apart from the distribution of timber receipts. The distribution of timber receipts would follow the 1937 O&C Act.

Salvage opportunities on O&C lands should be considered where appropriate to help promote reforestation and reduce fuel loading, in addition to the economic benefits. The Slater Fire area has over 11,702 acres of O&C lands located within the fire perimeter. There are 7,185 acres within matrix land allocation (see Figure 6). Salvage in the matrix land allocation within O&C lands will provide direct economic benefits to the Josephine County O&C accounts. Salvage potential as part of roadside salvage or area salvage harvest to recover economic value is in line with both matrix allocations from the LRMP, as amended and O&C land designations.
Figure 6: Land use allocation distribution showing matrix land, O&C land, and slope breaks of 0-35% and >35% to help identify area salvage potential.

**Matrix (Other than O&C)**
There are approximately 20,465 acres within the matrix land use allocation, aside from O&C, in the perimeter of the Slater Fire. The 48 Road provides a concentrated location for area salvage opportunity in support of the recovery of timber value and meeting land management plan objectives; however, other resource needs should be considered.

**Industry Capacity**
The Region has experienced catastrophic fires at a historic scope and scale, affecting private, State, Tribal, Bureau of Land Management (BLM), and other ownerships including six national forests. The BLM has authorities and requirements for salvage operations within their land management plans and has begun moving wood to mills in the Interstate 5 corridor. The private timber holdings are also salvaging burned wood from the fire as well as green blowdown from the wind event to maximize economic recovery. The strong timber market in 2020 provided a financial opportunity for landowners, purchasers, and operators to maximize return with green timber but is starting to decline as economic pressures increase and housing starts are slowing for the winter.

This situation can be a challenge to sell salvaged wood from NFS lands as mills are expecting high volumes of private and BLM timber in the next six to nine months. Fire-damaged wood requires special attention and extensive cleaning of mills to remove the char and carbon that is hard on saws and
equipment. Once mills finish processing the influx of fire-damaged wood, they are likely to return to green wood quickly. If salvaging burned NFS timber is delayed or slow, the window will close quickly, as burned wood deteriorates quickly, and the ability to meet objectives may be lost with no-bid sales and no economic recovery.

Industry capacity is not limited to mill capacity. Known issues exist with hiring laborers, truck drivers, and other woods workers for field operations (including reforestation crews). Low unemployment rates and urban growth along the Interstate 5 corridor prior to the 2020 pandemic have led to widespread shortages of woods workers. Equipment capacity has been a limitation for several years with logging equipment being very expensive to own and operate. Significant losses of logging equipment during the fires needs to be considered along with industry capacity to ensure operational success.

**WORKFORCE CAPACITY**

The Rogue River-Siskiyou has had RAT’s assigned to the Forest in 2014, 2015, 2017, 2018 and 2020, and over the past 20 years 56% of the Wild Rivers, Siskiyou Mountain and Gold Beach Ranger Districts have burned. They are all too familiar with post fire restoration and salvage planning. This has led to cumulative fatigue around wildfire management and on forest staff support of suppression efforts in general, and post-fire salvage, restoration and planning needs in particular. The Forest is also facing staffing shortages in their wildlife, NEPA, archaeology, engineering and timber sale prep/admin/layout/sale administration workforce. All the while the Forest has been tirelessly working to meet their timber and fuels targets, while also redeeming fisheries, wildlife and botany habitat restoration work. From a planning perspective, the Forest is preparing to sign a decision for the Shasta Agness Landscape Restoration Project, which may result in an additional litigation workload for the Forest to take on, and the Stella Project’s DEIS is in the comment period. In addition, the Rogue River-Siskiyou is designated as one of the Forests that will begin plan revision efforts in the near future, further taxing the workforce.

As the Forest has only one IDT, these ongoing and upcoming planning efforts will limit the capacity to take on additional intensive post-fire planning efforts, and there is a strong desire on behalf of both the Forest and Region that the Forest does not derail their green tree restoration program in pursuit of a large area salvage planning effort.

In 2017/18 the Forest pursued a salvage EA for the Chetco Bar Fire which resulted in an emergency situation determination (ESD), but due to the public controversy around the planning effort and fire salvage in general, and the time between the fire and the preparation of salvage sales, only half of the proposed area salvage was sold and implemented. This recent history, along with the workforce shortages mentioned highlighted by the Forest Supervisor are all solid reasons for not pursuing a large scale area salvage effort. Focusing on roadside hazard trees/danger trees and using CEs to accomplish any salvage work may allow the Forest to continue with their regular program of work with only minimal or moderate impacts to capacity. Careful considerations of the effects of pursuing a larger salvage effort to the Forest’s workforce capacities in pursuing their current vegetation restoration program will need to be made. The risk of litigation if salvage were pursued would also need to be seriously considered. In addition, as noted below, all existing NEPA decisions adjacent to the fires will need to be reviewed because of the changed conditions of the forest (primarily the Upper Applegate EA).

**OPTIONS FOR THE FOREST TO CONSIDER**

All options listed below must also include a changed conditions analysis for the Upper Applegate EA and an assessment of other NEPA decisions in proximity to the fires. In addition, all options need to consider
the recommendations noted in each resource section of this report, in particular for aquatics, wildlife, roads and recreation, as those recommendations may constrain/limit proposed actions due to the need to protect resource values at risk because of the impacts of the fires. The RAT strongly recommends that the Forest coordinate closely with the Klamath National Forest to ensure that the recommended options are not in conflict with their actions.

Option 1 (Least Complex):
- Complete BAER implementation and the changed conditions analysis as needed\(^2\). There will need to be a hard look at changed condition updates for existing NEPA decisions (for NSO consultation, cumulative effects, etc.), specialist reports and existing consultation with both the USFWS and NOAA for all projects.
- Use the existing decision under the Region 6 Aquatic Restoration EA for riparian planting (both streamside and unstable areas).
- Complete one CE\(^3\) for post-fire rehabilitation activities, use category 220.6(e)(11) post-fire rehabilitation activities up to 4,200 acres and use the existing decision under the Region 6 Aquatic Restoration EA for riparian planting (riparian reserves, which include streamside and unstable areas). A decision memo and supporting record would be required for the CE. The focus of the CE would be for treatments along Road 48, Bolan Lookout Road (4812) that leads to the repeater, access to mining claims, and other high-use roads and recreation sites. The post-fire rehabilitation CE requires implementation within three years post-fire. Completing NEPA at this time would provide for implementation when funding opportunities arise, including projects identified by the Forest:
  - i. Reforestation for first one to two years;
  - ii. Out year weed treatments;
  - iii. Developed recreation areas – replacement/repair/hazard mitigation not funded by BAER.
  - iv. Can include roadside danger tree treatments and road repair.
  - v. If decks are not sold during fire suppression (while the emergency is ongoing), they could be sold under this CE.
- The Forest can complete a reforestation CE (category 220.6(e)(5)) for reforestation in a couple of years to address future reforestation needs as well once additional seedlings have grown and can be procured.

**Pros**
- No need for notice, comment or objection and an Emergency Situation Determination (ESD\(^4\)) is not needed (only scoping is needed).
- Quickest means of addressing danger trees.
- Most focused level of analysis for specialists and allows for completion of current green project.
- Best addresses the forest’s limited workforce capacity.
- Addresses immediate need to assess existing NEPA decision for changed conditions, as warranted.

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\(^2\) See Appendix 1 and 2 for details.
\(^3\) See Appendix 3 for a list of all potential CEs that can be used after a fire.
\(^4\) See Appendix 3 for details on ESDs.
Cons

- Some risk of litigation around selling danger trees created by roadside danger tree treatments and hazard trees from recreation/administrative sites.
- This does not address potential salvage from O&C lands, which could benefit Josephine County and industry.

Option 2 (Multiple CEs):

- Complete BAER implementation and the changed conditions analysis as needed. There will need to be a hard look at changed condition updates for existing NEPA decisions (for NSO consultation, cumulative effects, etc.), specialist reports and existing consultation with both the USFWS and NOAA for all projects.
- Use the existing decision under the Region 6 Aquatic Restoration EA for riparian planting (both streamside and unstable areas).
- Complete one CE for roadside danger tree abatement for the roads not treated through suppression related danger tree felling; close roads until dangers are abated. A supporting record and decision memo are not required, but at least a project record is recommended. Use category 36 CFR 220.6(d)(4) to complete work on the remaining untreated roads that are identified to be maintained as open per the Forest’s Motor Vehicle Use Map; consult as needed. Follow the R6 Field Guide for Danger Tree Identification and Response along with R6 FSM supplement 7730-2007-2. These documents are available at: http://fsweb.r6.fs.fed.us/natural-resources/rapid-assessment-teams/
- Complete one CE for post-fire rehabilitation activities, use category 220.6(e)(11) post-fire rehabilitation activities up to 4,200 acres. A decision memo and supporting record would be required for the CE. The focus of the CE would be for hazard tree abatement at recreation sites and facilities, repair of recreation sites and facilities, and other restoration needs. The post-fire rehabilitation CE requires implementation within three years post-fire. Completing NEPA at this time would provide for implementation when funding opportunities arise, including projects identified by the Forest:
  i. Reforestation for first one to two years;
  ii. Out year weed treatments;
  iii. Developed recreation areas – replacement/repair/hazard mitigation not funded by BAER.
- The Forest can complete a reforestation CE (category 220.6(e)(5)) for reforestation in a couple of years to address future reforestation needs as well once additional seedlings have grown and can be procured.
- Complete one CE for less than 250-acre area salvage for the Slater Fire focusing on where O&C lands overlap with matrix, using category 36 CFR 220.6(e)(13), which limits salvage of dead and dying trees to 250 acres, with no more than ½ mile of temporary road construction; a decision memo and supporting record are required.

Pros

- No need for notice, comment or objection and an ESD is not needed (only scoping is required).
- Quickest means of addressing immediate recovery needs.
- Most focused level of analysis for specialists.

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5 See Appendix 1 and 2 for details.
6 See Appendix 3 for a list of all potential CEs that can be used after a fire.
• Addresses potential industry/county interest in recouping timber value.
• Would focus salvage largely on Matrix land, increasing the likelihood of successful implementation.
• Somewhat addresses the Forest capacity and workload concerns.
• Addresses immediate need to assess existing NEPA decisions, as warranted.

Cons
• The interconnected nature of the proximity of the proposed CE’s does present analysis challenges for effects.7
• Some risk of litigation around selling danger trees created by roadside danger tree treatments and hazard trees from recreation/administrative sites.
• Segmenting the analysis across multiple CE’s potentially does not allow for the same level of public engagement as an EA would allow for.
• Will likely have to do project-specific consultation for salvage.

Option 3 (Focused EA for Slater Fire):
• Complete BAER implementation and the changed conditions analysis as needed.8 There will need to be a hard look at changed condition updates for existing NEPA decisions (for NSO consultation, cumulative effects, etc.), specialist reports and existing consultation with both the USFWS and NOAA for all projects.
• Use the existing decision under the Region 6 Aquatic Restoration EA for riparian planting (both streamside and unstable areas).
• Develop a focused post-fire restoration EA for the Slater Fire with a small, focused area salvage component (salvage in matrix land, prioritized where it overlaps with O&C lands). Restoration activities could include reforestation, recreation site and roadside maintenance needs, (trails, trailheads, and campgrounds), instream wood placement, road repair, etc.9. Request an Emergency Situation Determination10 (ESD) from the Chief for this project to accelerate the implementation of the salvage.

Pros
• An EA could address restoration needs throughout the Slater Fire area with no acreage limitations, as well as recouping some economic value from salvaging trees.
• Minimizes the risk of litigation from danger tree removal efforts given the recent Region 5 court decision.
• Allows for more robust public engagement.
• Allows the Forest to address all potential restoration needs, as well as salvage opportunities.
• Would be able to use existing data from the Riverhouse planning area that was collected and other analyses to inform the planning effort.
• Addresses immediate need to assess existing NEPA decision, where warranted.

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7 The 2020 Council on Environmental Quality Regulations (CEQ) deleted the reference to cumulative effects; however, the description of effects that should be analyzed include those effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives.
8 See Appendix 1 and 2 for details.
9 The scope of the proposed action will be based on what does not get funded by BAER.
10 See Appendix 3 for information on ESDs.
**Cons**

- An EA would require more specialist engagement and analysis of an already extended workforce; additional staffing through detailers or via contractors would likely be needed.
- The planning would take more time and would require an ESD determination from the Chief to be able to implement next summer.
- The extended timeframe could lead to wood quality deterioration.
- The extended timeframe could also increase the risk of no bid sales due to wood deterioration and or market saturation.
- Will require more public engagement.
- Litigation risk from local community may likely be elevated if area salvage is pursued.

**RAT Recommendation**

The RAT recommends that the Forest pursue Option 1. We reached this conclusion based on the assessment of the Forest’s capacity to take on additional work, the potential trade-off related to the green timber program, and the need to address critical roads and infrastructure as quickly as possible.

This recommendation does not preclude the Forest from assessing whether or not they have the capacity to take on an area salvage CE limited to 250 acres; any other area salvage options would need to be documented in an Environmental Assessment at a minimum, which would impact Forest capacity and the green timber program.

**RAT Members/RO Staff**

Debbie Anderson, Regional Administrative Review Coordinator, Team Lead and NEPA assistance  
Joshua Chapman, Regional Wildlife Biologist  
Brian Spradlin, Regional Timber Program Manager  
Robyn Darbyshire, Regional Silviculturist  
Joy Archuleta, Regional Water Quality and Water Rights Program Manager  
Marin Palmer, Acting Assistant Director, Natural Resources  
Mike Spisak, Acting Director, Natural Resources  
Jennifer Zajac, DRM GIS point of contact  
Austin Lewandowski, DRM GIS point of contact

**Rogue River-Siskiyou National Forest Staff**

Merv George, Forest Supervisor  
Kathy Westenskow Davis, Deputy Forest Supervisor  
Eric Burke, Forest NR Staff Officer  
Scott Blower, District Ranger, Wild Rivers Ranger District  
Donna Mickley, District Ranger, Siskiyou Mountains Ranger District  
Karie Wiltshire, Acting Forest Environmental Coordinator  
Michelle Calvert, Environmental Coordinator  
Joni Brazier, Forest Soil Scientist/BAER Coordinator  
Steve Burns, Forest Fisheries Biologist  
Virginia Gibbons, Forest Public Affairs Officer/Partnership Coordinator  
Stuart Osbrack, Botanist  
Paul Podesta, Forest Roads Program Manager  
Michael Pond, Forest Timber Program Manager  
Zachariah Rodriguez, Zone Archaeologist
Kristin Ballard – Recreation Specialist
Sheila Colyer, District Wildlife Biologist
Matt Timchak, Forester/Westzone Timber Management Assistant
Appendix 1. Section 18 Reviews Existing NEPA Decisions

Existing NEPA decisions affected by the fires will require a changed condition analyses prior to any post-fire implementation (please note that all existing decisions, regardless of resource area, should be assessed for changed conditions). Of particular note, the Upper Applegate Project EA should be reviewed to ensure the decision made is still valid, given the changed circumstances caused by the fires.

Conducting Section 18 interdisciplinary reviews of these analyses and documenting them in Supplemental Information Reports, or SIRs (see Appendix 2 for an example of a SIR) would be a validation of a decision conducted under the NEPA process for an action that still needs to be implemented. A SIR is a report to examine new information in light of the original decision. The conclusion must support the original decision. If the decision needs to be modified or changed; then a supplemental EA or supplemental EIS has to be done (FSH 1909.15 18.1). It is important that the original decision is still valid, and that the NEPA supporting that document has not gone stale in light of the changed circumstances caused by the fire season in 2020. This process can be used to examine new or changed information that arises after the signing of a decision. Examples of new information that should be considered in a SIR for this project include but are not limited to; a watershed impacts up and downstream of the project Area, transportation needs for fire restoration, recreation impacts, and TES species such as the northern spotted owl & red tree vole. The interdisciplinary review should be conducted to determine if the decision is still valid even under the new information. If not the NEPA process will have to be initiated to change the original decision.

The SIR Interdisciplinary process can be manageable if the team working on it relies on the BAER & READ resources developed and used by the fire as well as the documentation prepared by the Forest as a part of the Rapid Assessment Team process. The Forest needs to ensure it has the capacity to complete any SIRs and still address the green program and outyear NEPA, along with any proposed fire restoration activities.

It is worth mentioning what a SIR is not. A SIR is not a NEPA or substitute for NEPA rather a SIR is a report that only assesses whether the current NEPA for a project/action is still valid. A SIR cannot be used to change the NEPA decision. A SIR cannot make up for stale NEPA.

If the SIR determines that supplemental analysis or a change to the decision is required, the Rogue River-Siskiyou National Forest must follow FSH 1909.15 18.4 for reconsideration of decisions based on an EA and Finding of No Significant Impact (FONSI):

- Use errata sheets to make simple corrections.
- Supplement or revise an EA if the interdisciplinary review of new information or changed circumstances indicates that changes in the EA are needed to address environmental concerns that have a bearing on the action or its impacts.
- Upon completion of the supplemented or revised EA, prepare a new finding of no significant impact (FONSI) which addresses the effects of the action. Reconsider the original decision; and, based upon the EA and FONSI, issue a new decision notice or document that the original decision is to remain in effect and unchanged. A new decision notice may address all or a portion of the original decision. Follow the instructions in chapter 40.
• If, based on the supplemented or revised EA, the proposed action may have a significant effect, issue a notice of intent to prepare an EIS. Follow the instructions in chapter 20.
APPENDIX 2. SUPPLEMENTAL INFORMATION REPORT:

SUPPLEMENTAL INFORMATION REPORT
USDA Forest Service
[NAME OF] NATIONAL FOREST
[District] RANGER DISTRICT

[Project Name]

Date

This Supplemental Information Report (SIR) will become part of the project record and is not a stand-alone analysis or decision. Rather, it documents whether the original decision and analysis is still valid and applicable given the new or changed information as it relates to the effects.

[Project Name] on the [District] Ranger District was originally signed on [Date of Decision] by [Name of Responsible Official and Title]. [Reason for the SIR]

[Describe Selected Action, any Changed conditions]

[If true use statement if not reword to describe changes] There are no changes proposed to the selected actions for the project. Additional measures based on specialist review may be required to accommodate changed conditions, but are still within the scope of the original intent and decision.

Measures that are considered for changed conditions include:
• [list]

Consideration of Effects

Based upon Forest Service Handbook 1909.15 (Chapter 10 Section 18 – “Review and Documentation of New Information Received After Decision Has Been Made”), if new information or changed circumstances relating to the environmental impacts of a proposed action come to the attention of the responsible official after a decision has been made and prior to completion of the approved program or project, the responsible official should review the information carefully to determine its importance. Consideration should be given to whether or not the new information or changed circumstances are within the scope and range of effects considered in the original analysis and decision.

This SIR does not constitute a National Environmental Policy Act (NEPA) decision nor does it intend to fulfill the requirements for a revised or supplemental NEPA analysis. This SIR does not intend to correct deficiencies in the original environmental documentation nor change a decision. (See FSH 1909.15 Chapter 10, Section 18.1)

Interdisciplinary Team Review, Findings and Summary are provided in the attached form.

Decision
[pick one]
• Based upon the findings presented to me, I have determined that the analysis and decision for the project remains sufficient and valid, and that the project may be implemented under the existing decision.

• Based upon the findings presented to me, I have determined that the analysis and decision for the project is not sufficient and therefore additional NEPA needs to be initiated.

________________________________________
Responsible Official signature          Date
FSH 1909.15 - SECTION 18 PROJECT REVIEW
Supplemental Information Report (SIR)

PROJECT NAME:  
DECISION DATE:  
REVIEW DATE:  

This form is to document that there are no changed conditions or new information that would require changes to an existing environmental analysis. Each specialist provides input to acknowledge whether a revised or supplemental NEPA analysis is or is not needed.

Sections are based on the issues analyzed in the EA and whether there are any changed conditions and whether those changed conditions would change the conclusions for the analysis, and if so is there a need to change the decision.

1) Soil Condition
   Comments:

   Specialist:
   Title:

2) Streams and Watershed Conditions
   Comments:

   Specialist:
   Title:

3) Transportation System
   Comments:

   Specialist:
   Title:

4) Wildlife
   Comments:

   Specialist:
   Title:

5) Rare Plants
   Comments:

   Specialist:
   Title:

6) Wildlife, Rare Plants, Fish and Aquatic Species
   Comments:

   Specialist:
   Title:
7) **Fish and Aquatic Species**
   Comments: 
   Specialist: 
   Title: 

8) **Recreational Uses**
   Comments: 
   Specialist: 
   Title: 

9) **Forest Scenery**
   Comments: 
   Specialist: 
   Title: 

10) **Heritage and Cultural Resources**
    Comments: 
    Specialist: 
    Title: Archaeologist 

11) **Range**
    Comments: 
    Specialist: 
    Title: 

12) **Timber**
    Comments: 
    Specialist: 
    Title: 

13) **Other**
    Comments: 
    Specialist: 
    Title: 

14) **Other Laws, Regulations, Forest Plan**
    Comments: 
    Specialist: 
    Title: 

Specialists in these resource areas have reviewed the new information or changed circumstances and have verified that the original NEPA analysis and disclosure regarding environmental effects is sufficient.

<table>
<thead>
<tr>
<th>HERITAGE RESOURCES</th>
<th>Are effects on Native American religious or cultural sites, archaeological sites or historic properties generally the same as predicted in the existing NEPA document?</th>
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<tr>
<td></td>
<td>_Yes ___ No</td>
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<th>T&amp;E FISH/WILDLIFE and PLANTS</th>
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<td>Are effects on threatened, endangered, proposed, sensitive species or critical habitat generally the same as predicted in the NEPA document?</td>
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<td>_Yes ___ No</td>
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<th>PUBLIC HEALTH AND SAFETY</th>
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<td>Are effects on public health and safety generally the same as predicted in the NEPA document?</td>
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<td>Explain:</td>
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<tr>
<th>UNCERTAINTY OF EFFECTS</th>
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<tr>
<td>Is the level of uncertainty or controversy over environmental effects of this action generally the same as predicted in the NEPA document?</td>
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<td>Explain:</td>
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<th>UNIQUE CHARACTERISTICS OF THE GEOGRAPHIC AREA</th>
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<tr>
<td>Are the effects on unique characteristics of the geographic area generally the same as predicted in the NEPA document? Unique characteristics include but are not limited to park lands, prime farm lands, wetlands, wilderness, wild and scenic rivers, and ecologically critical areas. (If the NEPA document indicates that there are no unique characteristics in the geographic area, then no effects were predicted.)</td>
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<td>_Yes ___ No</td>
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<td>Explain:</td>
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<th>ENVIRONMENTAL LAWS</th>
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<td>Is the action still consistent with Federal, State, and local laws or requirements for the protection of the environment? Consider any new laws, regulations, ordinances. Consider whether or not any actual effects have exceeded predicted thresholds to the point of threatening to violate any environmental requirements.</td>
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<td>_Yes ___ No</td>
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<td>Explain:</td>
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<th>NEPA COORDINATOR:</th>
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<tr>
<td>Additional analysis is necessary? _No ___ Yes</td>
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APPENDIX 3. NEPA Considerations for Post-fire Activities and Use of an Emergency Situation Determination

Categorical Exclusions (CE)
The final rule for the revised Forest Service 220 regulations does not have an expected publication date, so there are no new categories available for use at this time. The RO can provide a CE checklist/Decision Memo template if your unit does not already have one.

From FSH 1909.15 Chapter 30 & 36 CFR 220.6:

Categories of Actions for Which a Project or Case File and Decision Memo Are Not Required

While these actions fall within the categories of actions for which a project or case file and decision memo are not required, it is recommended that a project file is retained, particularly given the potential for extensive work along many roads and around administrative and recreation facilities. As with all CEs, scoping is required. Documentation, including a well-supported rationale for danger and hazard tree identification, should be complete in the record. Documentation should include the method used to identify danger and hazard trees, the supporting science and data behind the identification method chosen, and a rationale for removal of those trees which are still green, but have been identified as danger/hazard trees for public health and safety.

Use of a categorical exclusion implies consistency with the unit Forest Plan, and, if applicable, other plan level guidance such as the Northwest Forest Plan.

36 CFR 220.6(d)(3) Repair and maintenance of administrative sites.
36 CFR 220.6(d)(4) Repair and maintenance of roads, trails, and landline boundaries.
36 CFR 220.6(d)(5) Repair and maintenance of recreation sites and facilities.

Categories of Actions for Which a Project or Case File and Decision Memo Are Required

36 CFR 220.6(e)(5) Regeneration of an area to native tree species, including site preparation that does not involve the use of herbicides or result in vegetation type conversion.

36 CFR 220.6(e)(11) Post-fire rehabilitation activities, not to exceed 4,200 acres (such as tree planting, fence replacement, habitat restoration, heritage site restoration, repair of roads and trails, and repair of damage to minor facilities such as campgrounds), to repair or improve lands unlikely to recover to a management approved condition from wildland fire damage, or to repair or replace minor facilities damaged by fire. Such activities:
   i. Shall be conducted consistent with Agency and Departmental procedures and applicable land and resource management plans;
   ii. Shall not include the use of herbicides or pesticides or the construction of new permanent roads or other new permanent infrastructure; and
   iii. Shall be completed within 3 years following a wildland fire.

36 CFR 220.6(e)(13) Salvage of dead and/or dying trees not to exceed 250 acres, requiring no more than ½ mile of temporary road construction. The proposed action may include incidental removal of live or dead trees for landings, skid trails, and road clearing.
For areas with high insect and disease spread potential due to fire-related tree damage and mortality:

36 CFR 220.6(e)(14) Commercial and non-commercial sanitation harvest of trees to control insects or disease not to exceed 250 acres, requiring no more than ½ mile of temporary road construction, including removal of infested/infected trees and adjacent live uninfested/uninfected trees as determined necessary to control the spread of insects or disease. The proposed action may include incidental removal of live or dead trees for landings, skid trails, and road clearing.

HFRA Insect and Disease Infestation category: Section 8204 of the Agriculture Act of 2014 (Pub. L. 113-79) amended Title VI of the Healthy Forests Restoration Act of 2003 (HFRA) (16 U.S.C. 6591 et seq.) to add sections 602 and 603. Section 8407 of the Agriculture Improvement Act of 2018 (Pub. L. 115-334) later amended sections 602 and 603 to add hazardous fuels reduction projects to the types of projects that may be carried out under sections 602 and 603. Projects completed using the section 603 provisions are considered categorically excluded from the requirements of NEPA and evaluation of extraordinary circumstances is not required.

Projects may treat up to 3,000 acres when this category is used. A project file and decision memo are required. There are several other requirements which must be met to apply the HFRA insect and disease category. Work with the Regional Office if you are interested in using this category and you are not familiar with the limitations on its use.

Compliance with other laws, regulations, and policies:

Compliance with the Endangered Species Act (ESA) is required. Page 9 of the regional danger tree policy FSM-7730-2007-2 provides more detail. Forests will also need to be accountable for National Historic Preservation Act (NHPA) compliance for all hazard tree removal. Forest heritage staff can provide design criteria that can minimize impacts to known sites and areas with high site density. Additionally, forests should consult with the wildlife, botanist, fish, and soil scientist specialists when considering felling of danger trees. There may be a need for additional mitigation to protect these resources protected by other laws and to remain consistent with their forest plans.

Other laws, regulations, and policies may apply depending on the situation. Consult with your local environmental coordinator for additional guidance.

Considering an action which would be covered in an EA or EIS?

If your action does not fit within one of the above categories then consider using the EA/FONSI form developed by the national focused EA team found here.

- The form needs some adjustment to reflect the 2020 revised CEQ regulations; however, for the most part it remains consistent with the revised regulations as not much changed for EAs with the revision.
- The biggest change is that we no longer have the FONSI context and intensity factors found in the 1978 CEQ regulations. Work with the RO to complete your FONSI until national direction is available.
- The form is appropriate for actions where we can support a call that the effects of the action are not significant with little additional data collection or documentation.
- We should already have sound support in our agency files regarding the proposed agency action in the affected ecosystems to show that effects from fire salvage or other post-fire activities...
have not triggered significance in previous implementation. If a significant impact is expected then consider an EIS.

- If your action is going to require more in-depth documentation to evaluate the potential for significant impacts then use a standard EA or EA/FONSI template and process. Extremely large area salvage may require preparation of an EIS; please work with the RO prior to developing a proposal.

**Emergency Situation Determination (ESD)**

For FY21, it is the Region’s expectation that all NEPA will be completed by the end of the third quarter in FY21 (June 30, 2021), so that implementation can begin in the fourth quarter. If an ESD is not requested, the objection period would have to start by mid-March to complete the process by the regional deadline. With an ESD, all consultation, ESD requests and NEPA would need to be done by June 30.

Under the 218 objection process, the preliminary or draft EA must be circulated for a 30-day comment period (which can be combined with scoping) and a draft EIS must be circulated for a 45-day comment period (minimum), which cannot be combined with scoping. Following consideration of comments, the final EA, response to comments (if prepared) and draft decision or final EIS and draft decision must be circulated for a 45-day objection period. After the objection period, the Reviewing Officer (next higher level official than the responsible official) has 45 days to issue a written response to the objections; the Reviewing Officer may take an additional 30 days if needed to respond to objections or resolve objection issues.

An Emergency Situation Determination (ESD11) may be requested from the Chief. These take a minimum of 6 to 8 weeks to complete (an average of 7 weeks is used in the calculations below), after the ESD has been reviewed by the Region. The Forest must make a formal request to the Regional Forester for the ESD, which then is forwarded to the WO by the Regional Forester via the Regional Administrative Review Coordinator. An ESD means that there is no objection period (you must tell the public an ESD has been requested early in the process) and the project is implemented immediately after the Decision Notice or Record of Decision is signed and the public is notified of the decision. ESD requests are not guaranteed to be granted and can be controversial with some members of the public.

### Timelines for an EA or EIS (includes fieldwork, no ESD):

- Preparing the EA or EIS (includes scoping): 90-210 days
- Notice and Comment (if not combined with scoping for EAs): 30-45 days
- Objection Period: 45 days
- Objection Review/Resolution: 45-75 days
- **TOTAL**: 210-375 days

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11 Emergency Situation Determination – As per 36 CFR 218.21, the Chief and the Associate Chief of the Forest Service are authorized to make the determination that an emergency situation exists when immediate implementation of a decision is necessary to achieve one or more of the following: Relief from hazards threatening human health and safety; Mitigation of threats to natural resources on NFS or adjacent lands; Avoiding a loss of commodity value sufficient to jeopardize the agency’s ability to accomplish project objectives directly related to resource protection or restoration. When it is has been determined that an emergency situation exists, the proposed decision is not subject to the predecisional objection process. Implementation may proceed (1) Immediately after the decision is documented in a Decision Notice (DN) and notification of the public as described in 36 CFR 220.7(d); (2) Immediately after complying with the timeframes and publication requirements described in 40 CFR 1506.10(b)(2) when the decision is documented in a Record of Decision (ROD).
<table>
<thead>
<tr>
<th>Timelines for an EA or EIS (includes fieldwork, with ESD):</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparing the EA or EIS (includes scoping):</td>
<td>90-210 days</td>
</tr>
<tr>
<td>Notice and Comment (if not combined with scoping for EAs):</td>
<td>30-45 days</td>
</tr>
<tr>
<td>ESD Requested (can be concurrent with comment period):</td>
<td>56 days</td>
</tr>
<tr>
<td>TOTAL</td>
<td>176-311 days</td>
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</tbody>
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