Confederated Tribes *of the*
Umatilla Indian Reservation

Natural Resources Commission

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EXHIBIT SCHEDULE

FILE NUMBER: **CU-23-001**
APPLICANT: **CTUIR Department of Natural Resources – Range, Agriculture & Forestry Program**

HEARING DATE: **February 28, 2023**

EXHIBIT	NATURE OF EXHIBIT
1	Fourteen (14) Page Staff Report
2	Eighteen (18) Page Conditional Use Permit Application & Supplemental Packet
3	Seventy (70) Page EA/FONSI
4	Thirteen (13) Page Dissemination Record with TIDT Comments

STAFF REPORT
CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION (CTUIR)
TRIBAL PLANNING OFFICE

To: **Land Protection Planning Commission (LPPC)**
Public Hearing Date: **February 28, 2023**
File No.: **CU-23-001**

SUBJECT: Conditional Use request: Timber Harvest

APPLICANT and PROPERTY OWNER: CTUIR Department of Natural Resources – Range, Agriculture and Forestry Programs, 46411 Timíne Way, Pendleton, OR 97801

NATURE OF THE REQUEST:

Applicant seeks a Conditional Use approval from the LPPC to conduct a timber harvest on multiple lots owned by the CTUIR in fee and trust. The subject properties are identified as tax lots 110, 133, 140, 4660, 4670, 4690, 4800, 4900, 5000, 6300, 6400, 6500, 6600, 6800, 6900, and 7000 within Umatilla County Tax Map 2N35 in sections 20, 21, 22, 30, 31, and 32 along with trust lots 513, 514, 547, 548, 550, 694, 764, 765, 766, 767, 768, 808, 890, 892, 893, 896, 898, 912, 916, 956, 1021, 1178, 1191, 1278, 1043-A, 1057-A, 766-A, T1017, T1018, T1125, T2110, T2111, T2121, T546, T844-C, T844-D, and T897. All lots are within the external boundaries of the Umatilla Indian Reservation. The proposed harvest would be a commercial thinning and timber harvest within the lots to reduce fire danger and improve forest health.

The subject properties are zoned G-1, Big Game Grazing, where a timber harvest to remove more than 5,000 board foot gross is listed as a Conditional Use. Conditional Use approvals are subject to the CTUIR Land Development Code Chapters 6 and 13.

BASIC FACTS:

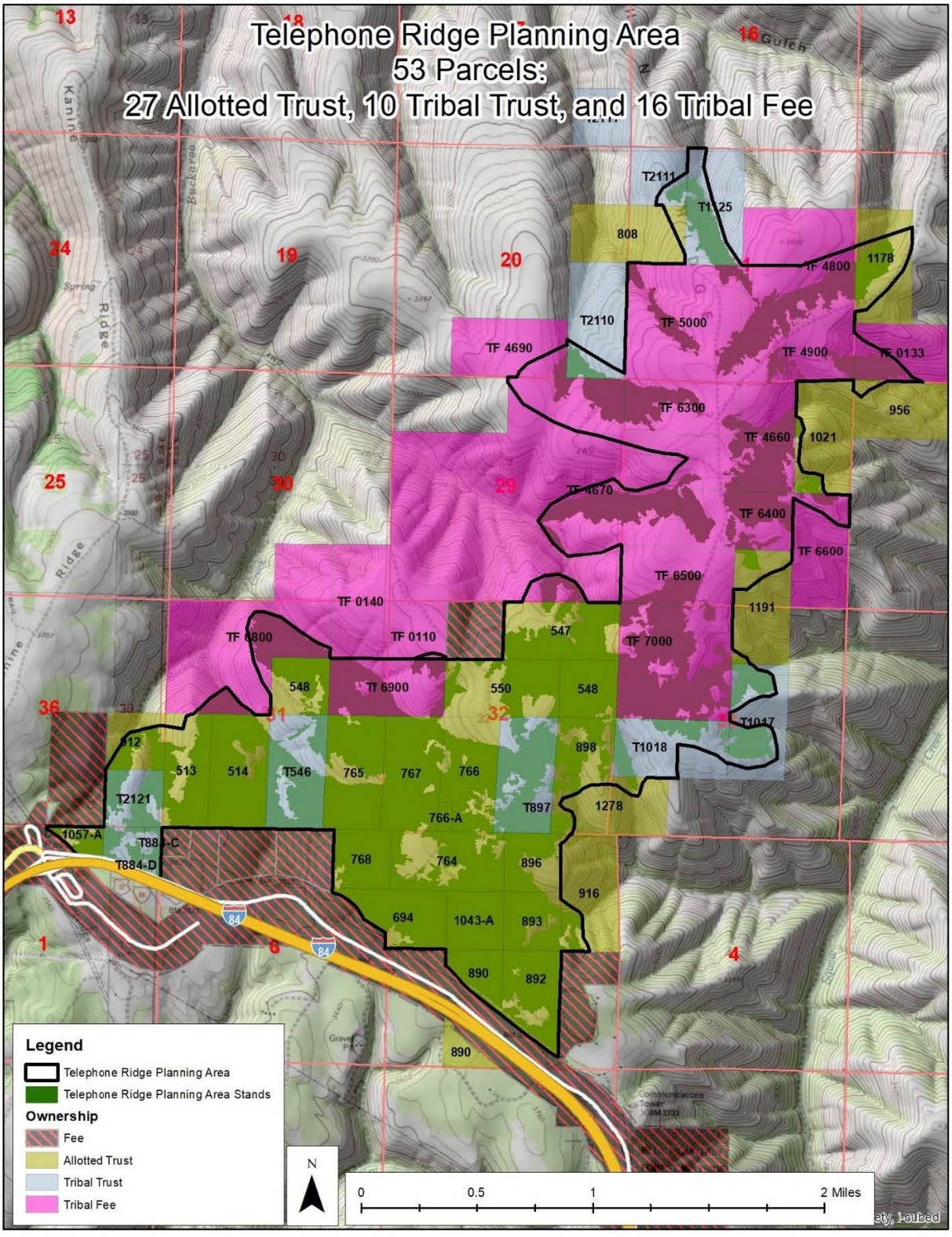
1) ***Subject Property/Ownership***: According to Umatilla County Assessor and CTUIR Economic and Community Development Realty Program/Bureau of Indian Affairs property records, the 53 subject properties are a combination of CTUIR fee land and trust land held by the U.S. Department of Interior Bureau of Indian Affairs (BIA) for the benefit of individual tribal members and the CTUIR. The CTUIR Department of Natural Resources Range, Agriculture and Forestry Program signed the Conditional Use Application approving this application to be submitted for CTUIR trust lands. The BIA Umatilla Agency Superintendent has completed the National Environmental Policy Act (NEPA) Find of No Significant Impact signifying approval for the submission of the Conditional Use application.

2) ***Legal Descriptions:*** The subject properties are identified as tax lots 110, 133, 140, 4660, 4670, 4690, 4800, 4900, 5000, 6300, 6400, 6500, 6600, 6800, 6900, and 7000 within Umatilla County Tax Map 2N35 in sections 20, 21, 22, 30, 31, and 32 along with trust lots 513, 514, 547, 548, 550, 694, 764, 765, 766, 767, 768, 808, 890, 892, 893, 896, 898, 912, 916, 956, 1021, 1178, 1191, 1278, 1043-A, 1057-A, 766-A, T1017, T1018, T1125, T2110, T2111, T2121, T546, T844-C, T844-D, and T897. All tax lots are within the external boundaries of the Umatilla Indian Reservation. The location of these properties is generally in the southeast corner of the Umatilla Indian Reservation to the north of I-84.

3) ***Zoning***: The subject properties are all zoned G-1, Big Game Grazing Forest. LDC Section 3.270 states: "The purpose of this zone is to preserve and maintain habitat for big game and other wildlife.

Lands within this zone are largely undeveloped and located at the higher elevations of the Reservation. Generally, these lands are utilized and managed for outdoor recreation, range and timber with very limited development."

Figure 1. Proposed Project Area



4) ***Current Use***: The subject properties are mostly undeveloped forest lands, though two allotments within the project area contain single family homes.

5) ***Surrounding Land Uses***: The proposed project area is immediately north of the ODOT rights-of-way containing Interstate 84 and Old Oregon Trail Highway. Oregon State Parks and Recreation Department manages the designated Blue Mountain Forest State Scenic Corridor along the Old Oregon Highway outside the I-84 ODOT rights-of-way. The surrounding areas are undeveloped forest lands, though several home sites exist to the south and southeast of the project areas clustered near I-84.

6) ***Utilities:*** No utilities serve this project area. Umatilla Electrical Cooperative service lines run adjacent to the south of the project area along the Old Oregon Trail Highway.

7) ***Legal Access***: Old Oregon Trail Highway runs along the southern edge of the property, providing access to unmaintained roads and trails within the proposed project area. Old Oregon Trail Highway is a two-lane highway operated and maintained by ODOT. The main haul/access roads will be SW and SE Telephone Ridge, with a small section of the project accessed off Buckaroo Lane. The application includes a description of planned access roads to be used for hauling that includes 13.2 miles of existing trails, and 2.3 miles of derelict remnant trails that would need to be restored. An additional 2.8 miles of new spur trails would be needed to access the upslope areas of steep stands to make cable-assisted logging possible on acreage with slopes in excess of 40%. These access roads are shown in Figure 2 below.

8) ***Intended Property Use*:** The current land uses will be maintained, and the proposed timber harvest will reduce fuel loads in a way that improves forest health and reduces fire risk to the project area and adjacent areas.

9) ***Current Stand Condition***: Most stands within the proposed Telephone Ridge harvest area are overstocked to between 1.5 and 3x the density that is recommend for their sites based on the CTUIR Forest Management Plan. Disease and bark beetle activity has also peaked in recent years (2018-2020), contributing to tree mortality and top-kill of ponderosa pine within the overly-dense stands.

10) ***Planned Forest Practices***: *(summarized from Applicant's Supplemental Packet, Exhibit #)* Specific information is included in Table 1. Information provided with the application states that proposed activities include commercial thinning, pre-commercial thinning (mostly hand thinning with limited mechanical thinning), prescribed burning (both pile burning and broadcast) and planting. 1,033 acres within the proposed project area will be considered for commercial thinning activities, as identified in Figure 2. Particularly steep areas and areas near riparian zones were excluded from the proposed harvest.

11) ***Permitting History***: According to Planning Office records, many of the subject parcels have had timber harvest conditional use permits or Forest Practice Permits. The most recent shows some overlap between the Emigrant Springs Timber Harvest and the proposed project. There are also several zoning permit records for residential structures on allotment 694 on the southern border of the proposed project area throughout the 1970's through early 1990's. Records show these homes still remain on the allotment.

12) ***Environmental Review***: A copy of the NEPA Finding of No Significant Impact for approval by the BIA Umatilla Agency Superintendent have been provided with this application.

Figure #2 – Proposed Timber Harvest Activities & Access

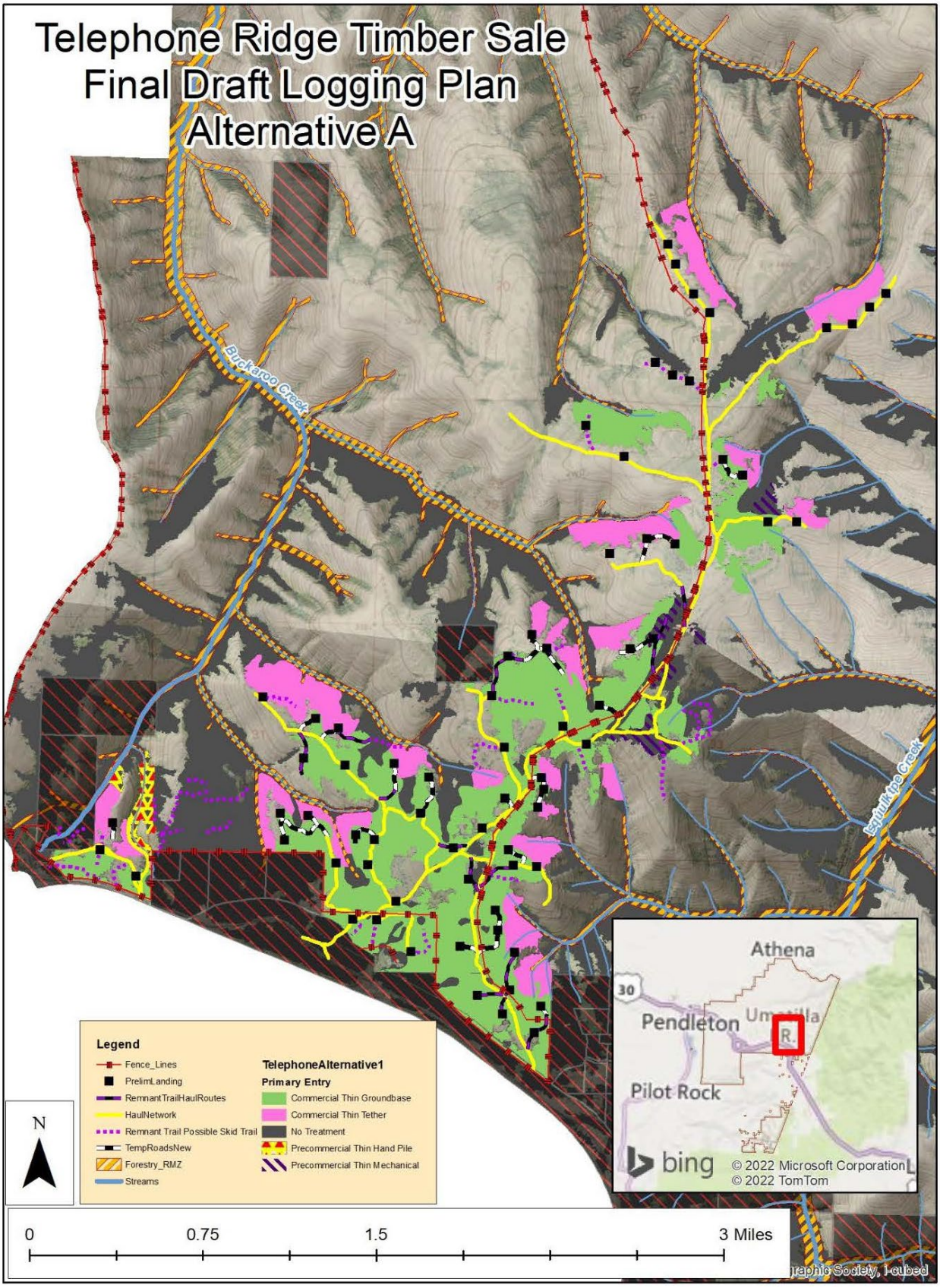


Table 1 – Summary of Proposed Treatments by Parcel

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
A	513	T2N R35E Sec.31	64.0	59.3	41.6	41.6				0.2
A	514	T2N R35E Sec.31	80.0	78.3	71.4	71.4				
A	547	T2N R35E Sec.32	80.0	79.4	53.5	53.5	25.4	16.5		
A	548	T2N R35E Sec.31, 32	80.0	79.1	61.6	61.6	38.2	23.3		
A	550	T2N R35E Sec.32	80.0	79.2	39.6	39.6	33.0			
A	694	T1N R35E Sec.5, 6	61.6	57.1	53.4	53.4	45.7			
A	764	T1N R35E Sec.5	81.0	80.0	55.0	55.0	49.9			
A	765	T2N R35E Sec.31	80.0	78.3	67.7	67.7	45.0	12.6		
A	766	T2N R35E Sec.32	75.0	73.5	50.7	50.7	24.5	6.3		
A	767	T2N R35E Sec.32	80.0	77.9	74.1	74.1	50.4	10.6		
A	768	T2N R33E Sec.3, T2N R34E Sec.14, T1N R35E Sec.6	80.2	40.4	38.5	38.5	31.0	1.3		
A	808	T2N R35E Sec.20, 21	80.0	6.9	4.0	0.1		0.1		
A	890	T1N R35E Sec.5	42.4	29.7	45.6	29.2	26.5			
A	892	T1N R35E Sec.5	58.2	60.1	52.3	52.3	43.7	7.9		
A	893	T3N R35E Sec.31, T2N R35E Sec.6, T1N	86.0	40.0	34.2	34.2	10.9	17.8		
A	896	T2N R34E Sec.4, 21, T1N R35E Sec.5	80.6	39.9	25.7	25.7	18.2	6.0		
A	898	T2N R35E Sec.32, T1N R33E Sec.1	70.4	39.8	26.1	26.1	14.6	0.3		
A	912	T2N R34E Sec.36, T2N R35E Sec.7	80.0	23.1	23.8	16.2		1.2		9.1
A	916	T1N R35E Sec.5	80.7	12.6	39.8	7.2				

EXHIBIT #1

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
A	956	T2N R35E Sec.27	80.0	3.6	33.7	0.4				
A	1021	T2N R35E Sec.28	80.0	11.0	34.8	6.1				
A	1178	T2N R35E Sec.22	80.0	36.2	18.5	15.7		12.9		
A	1191	T2N R35E Sec.28, 33	80.0	21.4	9.6	4.6	3.9			
A	1278	T2N R35E Sec.32, 33	80.0	23.3	15.5	10.8		4.3		
A	1043-A	T1N R35E Sec.5	40.0	40.1	40.1	40.1	38.8			
A	1057-A	T1N R34E Sec.1	16.5	16.0	10.9	10.8	9.5			
A	766-A	T2N R35E Sec.32	5.0	4.9	4.9	4.9	4.8			
T	T1017	T2N R35E Sec.33	80.0	40.2	34.9	26.9				
T	T1018	T2N R35E Sec.33	80.0	63.0	18.7	18.7	6.3		4.5	
T	T1125	T2N R35E Sec.21	80.0	42.1	24.2	22.4		18.1		
T	T2110	T2N R35E Sec.20	80.0	14.8	12.0	8.0	0.1			
T	T2111	T2N R35E Sec.17, 21	80.0	8.3	3.4	3.4		2.8		
T	T2121	T2N R34E Sec.36	40.0	39.5	24.9	24.9	0.1	13.3		
T	T546	T2N R35E Sec.31	80.0	78.4	51.3	51.3	22.0	17.6		10.9
T	T884-C	T1N R34E Sec.1	8.1	10.7	5.7	5.7	3.4	1.1		0.5
T	T884-D	T1N R34E Sec.1	18.1	19.9	10.4	10.5	9.1	1.3		
T	T897	T2N R35E Sec.32	80.0	78.8	56.7	56.7	43.2	6.1		

EXHIBIT #1

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
TF	TF 0110	T2N R35E Sec. 32	40.0	1.5	0.7	0.1				
TF	TF 0133	T2N R35E Sec. 22	80.0	19.7	20.0	12.9				
TF	TF 0140	T2N R35E Sec. 30, 31	80.0	0.0	6.3	0.0				
TF	TF 4660	T2N R35E Sec. 28	80.0	74.9	42.4	42.6	12.2	9.2	6.6	
TF	TF 4670	T2N R35E Sec. 28, 29	680.0	223.2	213.7	76.9	49.1	33.8		
TF	TF 4690	T2N R35E Sec. 20	80.0	11.9	2.6	2.6				
TF	TF 4800	T2N R35E Sec. 21	80.0	45.3	19.4	19.4		13.0		
TF	TF 4900	T2N R35E Sec. 21	160.0	118.1	42.3	40.8	5.6	0.3		
TF	TF 5000	T2N R35E Sec. 21	160.0	159.0	26.4	26.4	1.3	3.7		
TF	TF 6300	T2N R35E Sec. 28	80.0	74.3	25.9	25.9	2.2			
TF	TF 6400	T2N R35E Sec. 28	80.0	78.5	42.9	42.9	29.8	1.6		
TF	TF 6500	T2N R35E Sec. 28	80.0	77.5	16.1	16.0	10.9	1.9	4.8	
TF	TF 6600	T2N R35E Sec. 28	80.0	13.3	3.8	3.3		3.3		
TF	TF 6800	T2N R35E Sec. 30, 31	224.8	44.9	108.7	38.9		11.5	19.3	
TF	TF 6900	T2N R35E Sec. 31, 32	80.0	79.2	43.3	43.3	3.4	14.7		
TF	TF 7000	T2N R35E Sec. 33	160	156.2	108.5	108.6	40.6	4.8		
TOTAL Alternative A			4732.5	2764.0	1991.7	1620.5	753.5	279.3	35.2	20.7

EXHIBIT #1

APPLICABLE POLICIES AND CODES:

I. CTUIR Comprehensive Plan; *Resolution No. 18-098 (November 26, 2018)*; applicable Objectives

Chapter 5, Plan Elements: Goals & Objectives:

Section 5.6 Natural Resources

3. To protect, enhance and restore functional floodplain, channel, and watershed processes to provide sustainable and healthy habitat for aquatic species of the First Food order.

4. To provide sustainable harvest opportunities for big game species of the First Food order by protecting, conserving, and restoring big game populations and their habitats;

Section 5.7 Cultural Heritage

6. Protect and restore the First Foods and exercise associated rights reserved in the Treaty of 1855 for the perpetuation of tribal culture.

Section 5.11 Health & Human Services

1. Provide supportive environments that encompass all entities of the CTUIR (collaboration of health and human services departments, tribal leadership and non-health related departments) to enhance healthy lifestyles for every community member.

II. Land Development Code; adopted by CTUIR Board of Trustees Resolution #83-74 on August 24, 1983 and as amended through Resolution 21-013 (February 8, 2021).

Chapter 1, Section 1.020 – Purpose;
Chapter 2, Section 2.020 – Definitions; (36) – Conditional Uses;
Chapter 3, Sub-chapter L; G-1 – Big Game Winter Grazing Zones;
Chapter 4, Section 4.025 – Forest Practices;
Chapter 6, Conditional Uses;
Chapter 10, Site Plan Review;
Chapter 13, Hearings;

III. CTUIR Forest Management Plan (FMP); adopted by CTUIR Board of Trustees Resolution #10-022 (March 22, 2010);
Applying to all Reservation lands as referenced in Land Development Code Section 4.025.

IV. CTUIR Historic Preservation Code; adopted by CTUIR Board of Trustees Resolution 16-003 (January 25, 2016)

V. CTUIR Water Code; adopted by CTUIR Board of Trustees Resolution 20-090 (September 28, 2020)

STAFF FINDINGS:

A. ***Tribal Staff Review Committee (TSRC) & Timber Inter-Disciplinary Team (TIDT)***: Members of the CTUIR Tribal Staff Review Committee & the Timber Inter-Disciplinary Team received a copy of the application packet for CU-23-001 on January 19, 2023. A joint meeting of the TSRC & TIDT was held February 2, 2023 to review the application. The following comments were received:

Department of Natural Resources, Cultural Resources Protection Program Senior Archaeologist – confirmed that CRPP conducted a pedestrian survey of the proposed project area during the summer of 2022. Throughout the 1,721 acres surveyed, they attempted to locate 25 previously documented historical resources and documented 22 new resources. The Cultural Resources Survey report is pending. The Applicant should avoid these areas during the timber harvest; however, if the areas cannot be avoided, then the Applicant should work with CRPP and THPO to resolve adverse effects/mitigate

adverse effects. THPO and BIA will need to approve the Effects to Historic Properties before the project may move forward.

Department of Natural Resources, Water Resources Program Code Administrator – submitted comments that the proposed project meet the requirements necessitating a Stream Zone Alteration permit; however the proposed project could be eligible for an administrative variance from the Department of Natural Resources as the requirement within the Water Code exceeds the requirements of the Forest Management Plan. [The Water Code Administrator has provided a draft variance request to the Applicant/Senior Forester with the option to submit the request. If the Senior Forester does not submit the request, a Stream Zone Alteration permit application will be required.]

No other written or verbal comments were received from Committee members on or before the deadline date of February 9, 2023 to be included in these Findings.

B. ***Review of Conditional Use approval Criteria***: LDC Section 6.015 lists four Circumstances for Granting a Conditional Use (*italicized text*). The applicant has provided statements to demonstrate how the proposed use meets these criteria.

1. *That the locations, size, design, and operational characteristics of the proposed use are such that it will have minimal adverse impact on the property value, livability, and permissible development of the surrounding area. Consideration shall be given to compatibility in terms of scale, coverage, and density, to the alteration of traffic patterns and the capacity of surrounding streets and roads, and to any other relevant impact of the proposed use.*

   Applicant statement: "The proposed timber sale has been carefully planned to have the least possible adverse impact to the property value, livability, and permissible development of the surrounding area. The haul network for the timber sale uses non-formal forest trails created during past management activities and maintained in a haphazard way by BIA/CTUIR and forest users in the decades since. The main access/haul roads are SW and SE Telephone Ridge Route. A small section of the project is accessed by Buckaroo Ln. All access/haul roads connect to Old Emigrant Rd (Old Oregon Trail Highway) between I-84 Milepost 228-231.

   As planned, there is no requirement to cross private fee inholdings. A portion of the originally surveyed area could have been managed with negotiation of access across private properties, but the landowners, while supportive of forest treatments, were unresponsive or unwilling to permit access across their properties due to perceived conflict with livability and livestock management on their properties. Stands requiring this access were removed from consideration for treatment.

   Oregon Parks and Recreation maintains a scenic corridor along I-84 and crossing of portions of these lands will be required to access the Telephone Ridge Road network. A formal access permit will be negotiated with Oregon Parks for this purpose. Road surfaces within the project area are unimproved. Deep ruts are common during wet conditions. These low standard roads provide operational access for land management and allotment owner/tribal user access for cultural, subsistence, and recreational purposes, but precludes access during portions of wet season or by low clearance vehicles. The high amount of fallen logs and poor driving conditions along roadways has served to further constrain access in recent years. Forest users often establish new trails to avoid puddles and fallen trees, creating additional impacts along the unmaintained road network. Because the entirety of the road network in the planning area are non-system native surface forest roads and trails, they do not receive formal maintenance or dedicated access management.

   Many of the parcels in the most accessible portions of Telephone Ridge are allotments, and there are issues with collection of firewood or other forest resources by non-allotment owners, even when performed by enrolled CTUIR members. Access and collection could be pursued as a form of trespass. Given the high amount of fractionation of allotment interests, allotment access by tribal members is not

tightly regulated. This network of trails and forest roads are not public roads and are off-limits to the general public. Unauthorized access by non-Indians on tribal lands (regardless of land ownership type) is a major concern, but enforcement is challenging. Increases in unregulated forms of access related to public trespass, off-season hunting, shed collection, and off-road vehicle use and the pressure this places on big game wildlife and other resource values may be a consequence of reestablishing trails for active forest management.

Forest management activities will be constrained to the dry season, and native surface trails will receive routine rehab/maintenance to facilitate hauling. Upon completion of management activities, roads will be graded, water diversions installed where appropriate, and accessory trails blocked and seeded. Formal road reengineering would be useful to fix poor drainage areas, but the scale and scope of the necessary work is beyond what can be developed as part of this timber sale without more clear direction on longterm access management for the area.."

Discussion: The proposed timber harvest will decrease forest density to allow animal grazing and reduce ladder fuels. The proposed timber harvest does not change the undeveloped use of the property, and should reduce fire risk to surrounding properties. The short-term nature of the timber harvest should have minimal impact on traffic in the area.

Finding: The proposed use would have no impact on permissible development and property value of surrounding lands, and would contribute to increased fire safety of the area.

2. *That the site planning of the proposed use will, as far as reasonably possible, provide an aesthetically pleasing and functional environment to the highest degree consistent with the nature of the use and the given setting.*

Applicant Statement: "Allotment owners and other tribal members who frequent this planning area have grown accustomed to dense stand conditions but have been increasingly alarmed by the scale and rate of recent mortality and consider high amounts of dead, dying, and defective trees in these stands visually unappealing. In general, the result of the forest treatments in these dry forest stands will be a more open park-like arrangement of retained old ponderosa pine trees intermixed with healthy well-formed trees from a diversity size classes in the understory. Stands managed in this way are generally considered very aesthetically pleasing and are considered more representative of historical forest conditions prior to the fire-suppression policies of 20th century forest management, which has promoted overly dense stands composed of an unnaturally high proportion of intermediate sized and shade tolerant tree species. A more open forest canopy generally supports productive ground forage that is essential for many first foods species, particularly big game.

Much of the lands within this project area are not visible from the public interstate. Most of the immediately visible lands from public roads are in state or private ownership, properties that will be unchanged in this project. Thus, the casual public is unlikely to recognize the extent of work being completed in this project. Much of the local landowners who hold land within the reservation within or adjacent to the treatment areas generally support these proposed activities as they perceive a lack of active forest management on Tribal land has directly increased insect and disease problems on their properties. They also are concerned over the risk of catastrophic wildfire spread near their properties. Most land owners who have provided feedback approve of the style of uneven aged forest management implemented by CTUIR and the visual aesthetics it maintains. A majority share (by title interest) of landowners for all allotments within proposed treatments have consented to the proposed treatments in the form of a Power of Attorney for Sale of Allotment Timber (BIA Form 5-5315).

Some portions of stands will be cut very heavily where there has been widescale mortality due to bark

beetles or where beetles are actively infecting trees. These areas will be monitored following harvest and will be supplemented with planted trees where residual stocking and/or natural regeneration is not adequate.

Within the project area, a number of waterways are present, including tributaries of Buckaroo Creek and Isquulktpe Creek. Nearly all of the planned forest treatments are upslope of major waterways. Crossings of streams that are Strahler 1 or larger are not required. Ephemeral Strahler 0 order streams have are present in the area. Because these. One section of Strahler 0 order stream will require a temporary spur road crossing. This is an ephemeral stream that is dry except in major precipitation events. CTUIR Water Resources is familiar with this issue and is determining if a stream zone alteration permit is required for this crossing.

Otherwise, restrictions on operating equipment within protected Inner Riparian Management Zones and Floodplains as outlined in the CTUIR Forest Management Plan will be enforced to protect water quality."

Dicussion: The proposed timber harvest will reduce the stocking levels of trees to within thresholds recommended in the 1999 Powell Publication that are consistent with the CTUIR Forest Managemnt Plan. The resulting densities are generally considered to be aesthetically pleasing and better represents historical forest conditions prior to fire-suppression policies.

Several streams exist within the proposed project area. A proposed stream crossing of a Strahler 0 stream has been identified and will require either a Stream Zone Alteration permit or an administrative variance from the Department of Natural Resources.

Finding: The proposed timber harvest would provide a higher degree of aesthetic appeal while creating a more functional environment relative to current conditions.

3. *If the use is permitted outright in another zone, that there is substantial reason for locating the use in an area where it is only conditionally allowed, as opposed to an area where it is permitted outright.*

   Applicant Statement: "Forest management activities are a conditional use in the G-1 zone. G-1 zones and F-2 zones are the only zones on the reservation which contain commercially harvestable timber."

   Discussion: Timber harvests in excess of 5,000 gross board feet are only permitted by conditional use in zoning designations were timber harvests are permitted. Timber harvests are a viable way to responsibly manage property when fire risk exists.

   Finding: Timber harvest is a use that is only allowed with conditional use approval on certain lands within the boundaries of the Umatilla Indian Reservation. A timber harvest is not a use permitted outright in any zone.

4. *That the proposed use will be consistent with the purposes of this Code, the Comprehensive Plan, and any other statutes, codes or policies that may be applicable, and will support rather than interfere with the uses permitted outright in the zone in which it is located.*

   Applicant Statement: "This proposed actions comply with the standards, guidelines, and management direction established in the CTUIR Forest Management Plan (FMP), which was approved via Tribal resolution 10-022, on the 22nd day of March 2010.

The proposed actions are also in compliance with the management direction set forth in the National Indian Forest Management Act of 1990 as well as applicable federal laws such as 25 CFR (Code of Federal Regulations), National Historic Preservation Act, and National Environmental Protection Act.

A cultural resource survey request was initiated in the Fall of 2021. At the time, known sites within the project footprint and their required mitigation buffers were provided to forestry staff and these areas were excluded from initial layout and logging plans. Additional survey work for previously un-surveyed areas was conducted by CRPP staff over the summer of 2022. Final reports are in development but CTUIR DNR-RAF has maintained communication with CRPP throughout the planning process and anticipates a final THPO concurrence letter with a full list of mitigations for known sites will be provided prior to approval of the final timber sale contract and logging plan (anticipated Spring of 2023). A support memo from CTUIR DNR-CRPP is provided in this application. Continued consultation with CRPP program will occur throughout project to ensure mitigation measures are appropriately implemented for all documented or discovered cultural resource sites.

A NEPA environmental assessment has been prepared and was reviewed by CTUIR Timber Interdisciplinary Team Staff for compliance with Tribal Codes and Standards. The final Environmental Assessment is under review by the Bureau of Indian Affairs Northwest Regional Office. It is expected a Finding of No Significant Impact (FONSI) will be authorized by the Superintendent of the Umatilla Agency. A final cut-volume timber cruise has been applied following timber marking and prior to advertisement of the timber sale. This estimate of cut-volume, based on stand-level cruise data in all stands marked for commercial harvest, is ~6MMBF of sawlogs and an additional ~1.5 MMBF (8300 tons) of pulp material from standing dead and defective sections of sawlog trees.

This estimate accounts for between around 40% of the decadal allowable cut total for the decade of 2020-2029 (18.5 MMBF). Predicted stumpage value returned to CTUIR landowners would be between $1-$1.5 million dollars.

Timber harvest and associated traffic have the potential to directly impact access for traditional uses such as hunting, root/berry/medicine gathering, and firewood gathering in the short term. During thinning or prescribed fire activities, access for tribal members could be restricted or constrained in the interest of public safety. Increased vehicle use on roads during management may temporarily discourage deer and elk use of the area, further impacting hunting opportunities. In the long term, improved road conditions will increase opportunities for access for tribal public but could also encourage inappropriate and unregulated uses, and place greater hunting pressure on deer/elk. Reductions in tree canopy cover are expected to improve berry and root production and increase opportunities for gathering..”

Discussion:
Applicable Land Development Code sections include the following:

SUB-CHAPTER L. G-1 – BIG GAME GRAZING FOREST ZONE

SECTION 3.270 DESCRIPTION AND PURPOSE:

The G-1, Big Game Grazing Forest Zone is designated to provide critical range for big game populations. The purpose of this zone is to preserve and maintain habitat for big game and other wildlife. Lands within this zone are largely undeveloped and located at the higher elevations of the Reservation. Generally, these lands are utilized and managed for outdoor recreation, range and timber with very limited development.

SECTION 3.290 CONDITIONAL USES PERMITTED:

In a G-1 Big Game Grazing Forest Zone the following uses and structures accessory to permitted uses are permitted subject to the requirements listed under Sections 4.025 and 6.010 through

6.035 inclusive and upon issuance of a Development Permit or Forest Practices Permit. Accessory structures are not subject to the exceptions found in Section 16.010 of this Code.

1. Timber harvest, timber removal greater than 5,000 board foot gross, subject to Section 4.025 of this Code;

Applicable CTUIR Historic Preservation Code;

Section 5.01 – Cultural Resources Clearance. This section sets forth the Cultural Resources Clearance process for uses requiring Tribal permits. This requirement will be met if Applicant complies with second proposed Condition below.

SECTION5.01. CULTURAL RESOURCES CLEARANCES

1. Cultural resources clearance must be obtained prior to the issuance of any of the following permits. Certain activities may be exempted pursuant to subsection A(2) of this section.

a. Any construction, ground disturbing activity or land use on the Umatilla Indian Reservation requiring issuance of a development permit, conditional use permit, or other approval pursuant to the Confederated Tribes' Land Development Code;

b. Any Water Code permit;

Applicable CTUIR Water Code;
Chapter 4 of the CTUIR Water Code sets forth the Stream Zone Alteration permitting process for the Umatilla Indian Reservation. This requirement will be met if Applicant complies with proposed third Condition below.

CHAPTER 4. STREAM ZONE ALTERATIONS SECTION

4.01. AREA OF APPLICATION

This chapter applies to any person conducting construction or earth-moving work, debris placement or removal, or vegetation removal or modification within the named Stream Zones within the external boundaries of the Umatilla Indian Reservation as named below.

A. Any intermittent or perennial stream, lake, pond, spring, or any naturally occurring water body located in the G-1, Big Game Winter Grazing Zone, or the F-2, Restricted Indian Forest Zone, as described in the Umatilla Indian Reservation Land Development Code of the Umatilla Indian Reservation.

Findings: The G-1 designation prioritizes protecting critical rangeland for big game populations, and contributes to preserving wildlife and fish habitats important for First Foods. The proposed timber harvest is intended to reduce fire risk, which left unmanaged, has the potential to negatively impact rangeland, rivers, and other wildlife habitat.

CONCLUSIONS:
The criteria for the Conditional Use could be met for the proposed commercial timber harvest presented and explained by the applicant including:

1. Compatibility with the surrounding area and minimal impacts;
2. An aesthetically pleasing and functional site;

3. Substantial reason for locating the use in its current location;
4. Conformance with the Comprehensive Plan, Land Development Code and other applicable Statutes.

DECISION OPTIONS:

In acting on this request, the Land Protection Planning Commission must choose one of the following decision options:

1. **Approve** the Conditional Use request without **conditions**;
2. **Approve** the Conditional Use request **with conditions**;
3. **Deny** the Conditional Use request;
4. **Recess the hearing** until a specified time, date, and place; pending further testimony or information;
5. **Table** the decision until a subsequent Land Protection Planning Commission meeting.

STAFF RECOMMENDATION:

Based on the preceding facts, findings and conclusions, staff recommends approval of the Conditional Use with the following conditions:

1. A Forest Practices Permit shall be obtained from the Tribal Planning Office prior to the commencement of timber harvest activities. The Tribal Planning Office may place conditions on the Forest Practices Permit to the extent necessary to protect the natural resources impacted by the harvest operation.
2. Prior to issuance of a Forest Practices Permit, the applicant must obtain cultural resources clearance under Section 5.01 of the CTUIR Historic Preservation Code and shall maintain compliance with the clearance.
3. Prior to commencement with timber harvesting activities, the applicant must obtain an administrative variance to a Stream Zone Alteration Permit for the proposed crossing of a Strahler 0 stream, or obtain a Stream Zone Alteration permit as required by Chapter 4 of the Tribal Water Code.

CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION
Tribal Planning Office

CONDITIONAL USE / VARIANCE APPLICATION SUPPLEMENTAL SHEET

DEAR APPLICANT:

Please fill out this APPLICATION completely and as accurately as possible. If a block does not apply, write 'N/A" in the space provided. An incomplete application cannot be processed.

1) Please fill out your full name, current address and phone number.

2) Please fill out the full name, current address and phone number of the legal property owner (s) of the site your are requesting a permit for. If you are the sole property owner, simply write "same" on the first line.

3) This is the location of the site as described by section, township and range. If you are not familiar with this method or you do not have access to this information, we can assist in determining the location upon request.

4) Indicate whether the property is fee land (tax lot) or trust land (allotment) and the parcel number. Also specify the parcel acreage.

5) Indicate the right of way or easement road that allows legal access to the property (e.g., county, road, street, or access road).

6) Indicate the current use or uses of the subject property.

7) Indicate the specific use or uses for which you are requesting this conditional use/variance.

8) Explain in details on a separate sheet how the proposed use conforms to the conditional use/variance decision criteria (see attached page) and present a detailed site plan of the proposed use.

9) Read the statement carefully. Sign and date the application only after the application has been completely filled out.

NOTE: If the information presented is unclear or questionable, you may be required to provide further information such as lease agreements, evidence of legal access, legal ownership, etc.

****

IF YOU HAVE ANY QUESTIONS CONCERNING THE APPLICATION PROCESS OR CODE REQUIREMENTS, FEEL FREE TO EITHER STOP BY THE PLANNING OFFICE OR CONTACT THE OFFICE AT 429-7523

****

CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION
Tribal Planning Office
46411 Tímine Way, Pendleton, Oregon, 97801

CONDITIONAL USE APPLICATION

Fee: $100.00 Please Print

Applicant's Name: CTUIR DNR, Forestry, ATTN: Andrew Addessi
Address: 46411 Timine Way, Pendleton, OR 97801 Phone: 541-429-7245

Lot Owner's Name: CTUIR & BIA
Address: 46411 Timine Way, Pendleton, OR 97801 Phone: _____

Property Description: See Attached Table Section _____ Township _____ Range _____
Tax Lot ( ) Allotment ( ): _____ Present Zone: _____ Total Acreage: _____

Legal Access: Telephone Ridge Road; Buckaroo Ln

Present Use of Property (Description, including any existing structures and the current use): G-1 (Big Game)

Proposed Use: (Explain in detail on a separate sheet)

Decision Criteria: (Explain in detail on a separate sheet)

- A response shall be submitted with this application explaining how this request relates to the applicable decision criteria (see Attached).
- Also submit a statement explaining any other evidence you plan to present and **a detailed site plan** of the proposed use.

I understand that any false statements made on this application may cause subsequent approval by the Natural Resources Commission to be null and void.

I hereby certify that I understand that by signing this permit application, I am giving the CTUIR Tribal Planning Office the authorization to conduct any site inspections necessary in reviewing this application.

INCOMPLETE APPLICATIONS WILL NOT BE ACCEPTED!

Date: 1/13/2023 Applicant: CTUIR Range, Ag and Forestry
Agent: Andrew Addessi, Supervisory Forester

I am the (Circle One): Owner/owner's authorized representative (If authorized representative, attach letter signed by owner)

TRIBAL PLANNING OFFICE USE ONLY

File #: CU-23-001

Date Filed 1/13/2023 Reviewed By: Lora Elliott
Fee Paid: _____ Hearing Date: 2/28/2023

NOTE: _____

ATTACHMENT: Conditional Use Decision Criteria (Land Development Code Section 6.015

A Conditional use may be granted if, on the basis of the application, investigation and evidence submitted findings are made based on the criteria below. A Conditional Use may be granted unqualifiedly or may be granted subject to prescribed conditions.

(1) That the locations, size, design, and operations characteristics of the proposed use are such that it will have minimal adverse impact on the property value, livability, and permissible development of the surrounding area. Consideration shall be given to compatibility in terms of scale, coverage, and density, to the alteration of traffic patterns and the capacity of surrounding streets and roads, and to any other relevant impact of the proposed use.

(2) That the site planning of the proposed use will, as far as reasonably possible, provide an aesthetically pleasing and functional environment to the highest degree consistent with the nature of the use and the given setting.

(3) If the use is permitted outright in another zone, that there is substantial reason for locating the use in an area where it is only conditionally allowed, as opposed to an area where it is permitted outright.

(4) That the proposed use will be consistent with the purposes of this Code, the Comprehensive Plan, and any other statutes, ordinances or policies that may be applicable, and will support rather than interfere with the uses permitted outright in the zone in which is it located.

Variance Decision Criteria (Land Development Code Section 8.015)

A Variance may be granted if, on the basis of the application, investigation and evidence submitted findings are made based on the criteria below. A variance may be granted unqualifiedly or may be granted subject to the prescribed conditions. A variance may be granted only in the event that all of the following circumstances exist:

(1) Exceptional or extraordinary circumstances apply to the property which do not apply generally to other properties in the same zone or vicinity and result from lot size or shape, topography or other circumstances over which the owners of property since enactment of this Code have had no control.

(2) The variance is necessary for the preservation of a property right of the applicant substantially the same as possessed by the owners of other property in the same zone or vicinity.

(3) The variance would not be materially detrimental to the purposes of this Code or to property in the same zone or vicinity in which the property is located or otherwise conflict with the objectives of any Reservation Plan or Policy.

(4) The variance requested is the minimum variance which would alleviate the hardship.

Telephone Ridge Timber Sale Conditional Use Supplemental Packet

Narrative/Proposed Use:

The proposed conditional use permit application is for a commercial thinning (timber sale) and associated forest health and fuels treatment activities on forest stands within portions of Telephone Ridge, Isqúulktpe Creek and Upper Isqúulktpe Creek forest compartments within the Umatilla Indian Reservation (UIR). This area is collectively called Telephone Ridge and is roughly the upland area within the UIR boundary bounded by Buckaroo Creek to the West, I-84 to the South, and Isqúulktpe Creek to the East.

Data from CTUIR past forest inventory efforts support evidence that nearly all stands in the planning are currently far in excess of recommended stocking levels for these ponderosa pine and mixed conifer forest types, most stands in the Telephone Ridge Timber Sale are carrying between 1.5x-3x the density of trees than are recommended for their sites[1]. Overstocked conditions predispose stands to high levels of mortality due to the compounding impacts of drought, insect pressure, and other forest pathogens.

Under these conditions, forest health in the stands within the Telephone Ridge planning area have quickly deteriorated in recent years. Large patches of beetle activity have been evident since the mid 2010s and quickly escalated over the subsequent years, peaking in 2018-2020. This timing coincides with prolonged droughts and record heat in the inland Northwest during many of these years. Western pine beetle and pine engraver (*Ips pini*) are the main insect agents evident, preying on both large and small diameter ponderosa pine, causing wide scale mortality and top-kill of ponderosa pine in over-dense stands. Large patches of dead and dying trees, primarily intermediate and codominant ponderosa pine trees, are evident in many of the drier stands in the planning area. Other disease issues contributing elevated levels of morality include evidence of root rot centers (predominantly *Armilaria spp.*) in moist mixed conifer sites, especially effecting Douglas-fir and grand fir. Severe mistletoe is prevalent on many of the Douglas-fir and the few scattered western Larch in these mixed conifer stands.

The buildup of live ladder fuels and dry and dead heavy surface fuels is concerning given the high likelihood of a human-caused or natural wildfire event. This area is considered a Wildland Urban Interface (WUI) as it borders a major transportation corridor (I-84 Interstate) as well as a number of home sites and major utility infrastructure (powerlines, gas pipelines, cell towers). Current stocking levels and stand structure are such that a large stand-replacing wildfire is more likely to carry throughout much of the compartment if an ignition occurred during dry summer months. Stand conditions are similar on adjacent ownerships including state and private lands that abut the I-84 interstate highway, but CTUIR does not directly manage these stands.

Maintaining healthy stand conditions more resilient to future climate and wildfire disturbance is one measure to protect first foods habitat and mitigate catastrophic loss of tribal and public resource values in an uncertain future. Timely forest management in this planning area is therefore recommended to reduce density and continuity of live trees, reduce accumulated dead surface and ladder fuels, maintain healthy stand densities and structures, and to mitigate lost timber value for Indian landowners whose timbered stands have been effected by elevated levels of mortality.

[1] CTUIR Forest Management Plan recommends managing forest densities using the Powell (1999) publication: **Powell, D.C. 1999**. Suggested Stocking Levels for Forest Stands in Northeastern Oregon and Southeastern Washington: An Implementation Guide for the Umatilla National Forest. USDA Forest Service Umatilla National Forest Technical Publication F14-SO-TP-03-99. Pendleton, OR.

Telephone Ridge has been a high priority for treatment since the early detections of large-scale mortality around 2017, however, many of the surrounding CTUIR timber compartments were also in need of timely treatment at the same time. CTUIR DNR-RAF has been steadily implementing similar thinning treatments through large blocks of tribal forest land along the I-84 WUI at the fastest possible rate given staff and administrative capacity. To date, stands within compartments immediately South of I-84 have been undergone thinning treatments through the Emigrant Springs timber sale (2018-2020), and North Fork McKay timber Sales (2021-2022).

Project Activities:
In total, 2764 gross acres and 1621 forested acres were included in the project footprint and were analyzed for forest treatments in this planning area. Following initial analysis, we propose 1033 acres of commercial thinning. Of these acres, 754 acres are suitable for low-complexity ground-based logging equipment. An additional 279 acres occur on slopes between 40-100% and would require cable-assist (tether) logging equipment to harvest. Trees will be selected for harvest from all merchantable size classes (greater than 9" in diameter) to meet stand objectives. Some stands in the planning compartment with insufficient merchantable volume to include in the commercial thin are designated for precommercial thinning work as a primary entry to reduce stocking to appropriate densities and promote disease-resistant and fire-resilient species composition. We have identified approximately 35 acres of stand-alone mechanical PCT (mastication) and another 21 acres of hand thinning/piling to be implemented in the planning area in areas where no commercial thinning is proposed.

Following commercial thinning, all units will be considered for a follow-up Timber stand improvement (TSI) treatment to guide the succession of the stands toward desired future conditions. TSI involves precommercial thinning of small diameter (less than 9") trees, either by hand crews or with mechanical equipment (mastication). This TSI work is necessary to remove thick patches of shade tolerant conifer regeneration too small for commercial harvest, to promote growth of disease-free and defect-free early successional conifers, and to generally reduce the likelihood of a stand-replacing wildfire event by reducing ladder fuels and creating gaps between tree canopies. TSI work also supports prescribed fire implementation by reducing likelihood of group torching or other holding concerns. TSI needs will be assessed on a stand-by-stand basis, some stands may be withheld from follow-up TSI work if understory densities are already in desired condition, or there are benefits to other resource objectives (e.g. wildlife cover) to retain high densities. TSI will generally be performed by hand crews performing lop and scatter or pile thinning. Some stands that retain very high understory densities or excessive surface fuels may be proposed for mechanical thinning (mastication).

Prescribed fire is planned as a secondary treatment following thinning in much of this planning area. Burning of landing piles and hand thin piles will occur within 1-2 years of their creation. Additionally, low-complexity broadcast burning will be considered for stands following thinning. Broadcast burning is an important forest management tool in these dry forest systems, emulating low-to-moderate wildfire/traditional fire effects which would have occurred in these stands prior to fire suppression policies of the preceding century. These dry ponderosa forest types co-evolved with regular fire return intervals of 0-50 years[2]. Broadcast fire can reinvigorate now decadent shrub communities, improve grazing forage, improve habitat conditions for First Foods, create favorable sites for both natural and artificial tree regeneration, reduce excess surface and ladder fuels that heighten risk of severe fire

[2] Fryer, Janet L. 2018. Pinus ponderosa var. benthamiana, P. p. var. ponderosa: Ponderosa pine. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Missoula Fire Sciences Laboratory (Producer). Available: www.fs.usda.gov/database/feis/plants/tree/pinponp/all.html

effects in unmanaged conditions, and enable CTUIR to maintain a more regular low-intensity fire regime through managed burns in the future.

Prescribed broadcast fire will be considered for as much of the relatively flat acreage as is feasible. Prescribed fire units will be designed so that implemented burns will spread outside of the planning area, with an emphasis on making use of logging roads and skid trails for holding perimeters. Broadcast burning of steep areas will be limited due to holding concerns. Any resource sites that require protection from fire will be excluded. Final units and acreage will be determined following the thinning entries. It is expected that between 500-700 acres of the planning area, including both forest stands and their immediate perimeters in open scab flat areas, could receive prescribed broadcast burn treatments.

CTUIR forestry staff anticipate some artificial regeneration following the commercial harvest operations. While the thinning approach seeks to retain fully stocked stands, the forestry program will identify patch cuts larger than 2 acres due to insect and disease centers or large scale removal of grand fir. These patches will be planted with ponderosa pine (and Douglas-fir and/or Western larch where appropriate) and will be monitored for 5 years to ensure full stocking. Site preparation for reforestation efforts will depend on regeneration method and plant association, but could include prescribed fire, mechanical slash treatment, and spot spraying of approved chemical herbicides.

It is expected a commercial timber sale contract will require 3 summer seasons to complete, with 300-500 acres thinned per year. Follow-up TSI and prescribed fire activities will occur within 2-3 years of the commercial thinning. In total, it may take up to 5 years to complete all management actions proposed in this application (2023-2027).

Transportation Management:
It is estimated that up to 13.2 miles of existing trails would have to be maintained and 2.3 of derelict remnant trails would have to be restored in order to facilitate equipment access. Additionally, 2.8 miles of native surface spur trails would be required for hauling. These new trails are mainly needed to access the upslope of steep stands. Past harvest entries on steep stands in the 1950's generally used roads and trails built within the floodplain of creek drainages, trails that will not be reopened in this project and will continue to be derelict due to water quality concerns in reestablishing road/trails near floodplains.

Road maintenance (blading, limited spot rocking) on existing haul roads is proposed as part of the timber sale contract. Maintenance will occur at the initiation of commercial thinning within an area, and will be required periodically throughout hauling to protect against excessive rutting. Also proposed is reestablishment of some relic trails for hauling and skidding.

Any relic trails or new native surface trails or major skid trails established in connection with this sale will be blocked with cull logs or other natural barriers, water barred, and reseeded with native grass/forb mix following treatment. More aggressive forms of reclamation such as ripping and recontouring is not proposed, but could be approached as a stand-alone project following completion of all activities associated with this project as a further approach to regulate future travel and access in this area.

Other formal access management approaches including significant barriers/gates at project area entry points, regulated seasonal closures, and regular patrol by law enforcement personnel could all serve to protect resource values from inappropriate use. A dedicated planning effort to determine access management in this and other forested areas of the reservation is needed to better inform long-term management of forest road infrastructure following timber management.

Conditional Use of Property (Decision Criteria):

1.) **The location, size, design, and operations characteristics of the proposed timber harvest will have minimal adverse impacts on the property value, livability, and permissible development of the surrounding area.**

The proposed timber sale has been carefully planned to have the least possible adverse impact to the property value, livability, and permissible development of the surrounding area. The haul network for the timber sale uses non-formal forest trails created during past management activities and maintained in a haphazard way by BIA/CTUIR and forest users in the decades since. The main access/haul roads are SW and SE Telephone Ridge Route. A small section of the project is accessed by Buckaroo Ln. All access/haul roads connect to Old Emigrant Rd (Old Oregon Trail Highway) between I-84 Milepost 228-231.

As planned, there is no requirement to cross private fee inholdings. A portion of the originally surveyed area could have been managed with negotiation of access across private properties, but the landowners, while supportive of forest treatments, were unresponsive or unwilling to permit access across their properties due to perceived conflict with livability and livestock management on their properties. Stands requiring this access were removed from consideration for treatment.

Oregon Parks and Recreation maintains a scenic corridor along I-84 and crossing of portions of these lands will be required to access the Telephone Ridge Road network. A formal access permit will be negotiated with Oregon Parks for this purpose.

Road surfaces within the project area are unimproved. Deep ruts are common during wet conditions. These low standard roads provide operational access for land management and allotment owner/tribal user access for cultural, subsistence, and recreational purposes, but precludes access during portions of wet season or by low clearance vehicles. The high amount of fallen logs and poor driving conditions along roadways has served to further constrain access in recent years. Forest users often establish new trails to avoid puddles and fallen trees, creating additional impacts along the unmaintained road network. Because the entirety of the road network in the planning area are non-system native surface forest roads and trails, they do not receive formal maintenance or dedicated access management.

Many of the parcels in the most accessible portions of Telephone Ridge are allotments, and there are issues with collection of firewood or other forest resources by non-allotment owners, even when performed by enrolled CTUIR members. Access and collection could be pursued as a form of trespass. Given the high amount of fractionation of allotment interests, allotment access by tribal members is not tightly regulated. This network of trails and forest roads are not public roads and are off-limits to the general public. Unauthorized access by non-Indians on tribal lands (regardless of land ownership type) is a major concern, but enforcement is challenging. Increases in unregulated forms of access related to public trespass, off-season hunting, shed collection, and off-road vehicle use and the pressure this places on big game wildlife and other resource values may be a consequence of reestablishing trails for active forest management.

Forest management activities will be constrained to the dry season, and native surface trails will receive routine rehab/maintenance to facilitate hauling. Upon completion of management activities, roads will be graded, water diversions installed where appropriate, and accessory trails blocked and seeded. Formal road reengineering would be useful to fix poor drainage areas, but the scale and scope of the necessary

work is beyond what can be developed as part of this timber sale without more clear direction on long-term access management for the area.

2.) **That the site planning of the proposed use will, as far as reasonably possible, provide an aesthetically pleasing and functional environment to the highest degree consistent with the nature of the use and the given setting.**

Allotment owners and other tribal members who frequent this planning area have grown accustomed to dense stand conditions but have been increasingly alarmed by the scale and rate of recent mortality and consider high amounts of dead, dying, and defective trees in these stands visually unappealing. In general, the result of the forest treatments in these dry forest stands will be a more open park-like arrangement of retained old ponderosa pine trees intermixed with healthy well-formed trees from a diversity size classes in the understory. Stands managed in this way are generally considered very aesthetically pleasing and are considered more representative of historical forest conditions prior to the fire-suppression policies of 20th century forest management, which has promoted overly dense stands composed of an unnaturally high proportion of intermediate sized and shade tolerant tree species. A more open forest canopy generally supports productive ground forage that is essential for many first foods species, particularly big game.

Much of the lands within this project area are not visible from the public interstate. Most of the immediately visible lands from public roads are in state or private ownership, properties that will be unchanged in this project. Thus, the casual public is unlikely to recognize the extent of work being completed in this project. Much of the local landowners who hold land within the reservation within or adjacent to the treatment areas generally support these proposed activities as they perceive a lack of active forest management on Tribal land has directly increased insect and disease problems on their properties. They also are concerned over the risk of catastrophic wildfire spread near their properties. Most land owners who have provided feedback approve of the style of uneven aged forest management implemented by CTUIR and the visual aesthetics it maintains. A majority share (by title interest) of landowners for all allotments within proposed treatments have consented to the proposed treatments in the form of a Power of Attorney for Sale of Allotment Timber (BIA Form 5-5315).

Some portions of stands will be cut very heavily where there has been widescale mortality due to bark beetles or where beetles are actively infecting trees. These areas will be monitored following harvest and will be supplemented with planted trees where residual stocking and/or natural regeneration is not adequate.

Within the project area, a number of waterways are present, including tributaries of Buckaroo Creek and Isquulktpe Creek. Nearly all of the planned forest treatments are upslope of major waterways. Crossings of streams that are Strahler 1 or larger are not required. Ephemeral Strahler 0 order streams have are present in the area. Because these. One section of Strahler 0 order stream will require a temporary spur road crossing. This is an ephemeral stream that is dry except in major precipitation events. CTUIR Water Resources is familiar with this issue and is determining if a stream zone alteration permit is required for this crossing.

Otherwise, restrictions on operating equipment within protected Inner Riparian Management Zones and Floodplains as outlined in the CTUIR Forest Management Plan will be enforced to protect water quality.

3.) **If the use is permitted outright in another zone, that there is substantial reason for locating the use in an area where it is only conditionally allowed, as opposed to an area where it is permitted outright.**

Forest management activities are a conditional use in the G-1 zone. G-1 zones and F-2 zones are the only zones on the reservation which contain commercially harvestable timber.

4.) **That the proposed use will be consistent with the purposes of this Code, the Comprehensive Plan, and any other statutes, ordinances or policies that may be applicable, and will support rather than interfere with the uses permitted outright in the zone in which is it located.**

This proposed actions comply with the standards, guidelines, and management direction established in the CTUIR Forest Management Plan (FMP), which was approved via Tribal resolution 10-022, on the 22nd day of March 2010. The proposed actions are also in compliance with the management direction set forth in the National Indian Forest Management Act of 1990 as well as applicable federal laws such as 25 CFR (Code of Federal Regulations), National Historic Preservation Act, and National Environmental Protection Act.

A cultural resource survey request was initiated in the Fall of 2021. At the time, known sites within the project footprint and their required mitigation buffers were provided to forestry staff and these areas were excluded from initial layout and logging plans. Additional survey work for previously un-surveyed areas was conducted by CRPP staff over the summer of 2022. Final reports are in development but CTUIR DNR-RAF has maintained communication with CRPP throughout the planning process and anticipates a final THPO concurrence letter with a full list of mitigations for known sites will be provided prior to approval of the final timber sale contract and logging plan (anticipated Spring of 2023). A support memo from CTUIR DNR-CRPP is provided in this application. Continued consultation with CRPP program will occur throughout project to ensure mitigation measures are appropriately implemented for all documented or discovered cultural resource sites.

A NEPA environmental assessment has been prepared and was reviewed by CTUIR Timber Interdisciplinary Team Staff for compliance with Tribal Codes and Standards. The final Environmental Assessment is under review by the Bureau of Indian Affairs Northwest Regional Office. It is expected a Finding of No Significant Impact (FONSI) will be authorized by the Superintendent of the Umatilla Agency.

A final cut-volume timber cruise has been applied following timber marking and prior to advertisement of the timber sale. This estimate of cut-volume, based on stand-level cruise data in all stands marked for commercial harvest, is ~6MMBF of sawlogs and an additional ~1.5 MMBF (8300 tons) of pulp material from standing dead and defective sections of sawlog trees.

This estimate accounts for between around 40% of the decadal allowable cut total for the decade of 2020-2029 (18.5 MMBF). Predicted stumpage value returned to CTUIR landowners would be between $1-$1.5 million dollars.

Timber harvest and associated traffic have the potential to directly impact access for traditional uses such as hunting, root/berry/medicine gathering, and firewood gathering in the short term. During thinning or prescribed fire activities, access for tribal members could be restricted or constrained in the interest of public safety. Increased vehicle use on roads during management may temporarily discourage deer and elk use of the area, further impacting hunting opportunities. In the long term, improved road conditions will increase opportunities for access for tribal public but could also encourage inappropriate and unregulated uses, and place greater hunting pressure on deer/elk. Reductions in tree canopy cover are expected to improve berry and root production and increase opportunities for gathering.

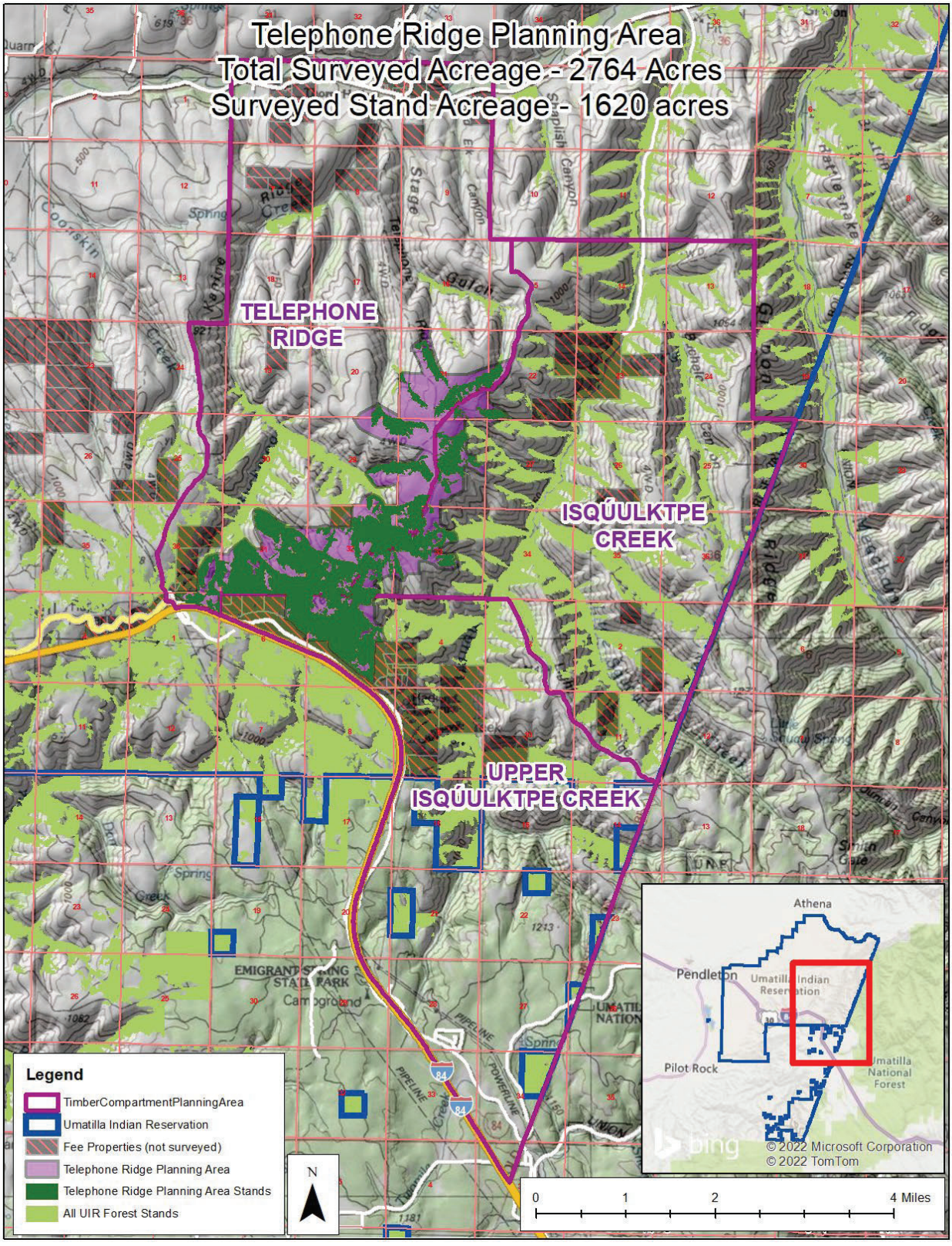


Figure 1: Map of Telephone Ridge planning area in relation to Umatilla Indian Reservation Boundaries and CTUIR Forest Management Compartment Boundaries. A large amount of forested areas in these compartments are in steep rugged canyons along Iskquulktpe Creek and Buckaroo Creek. There are limited options for active management in many of those stands.

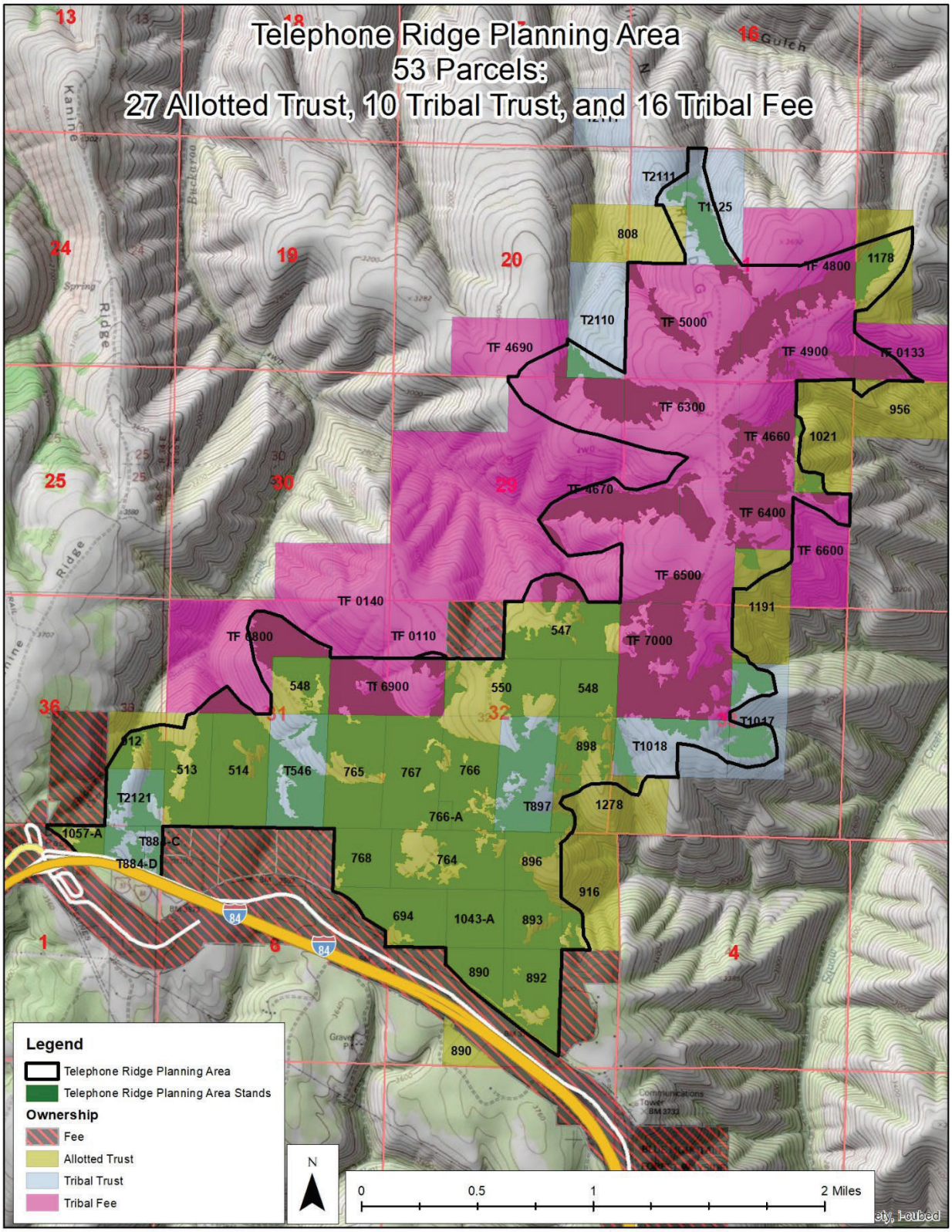


Figure 1: Map of land ownership designation within planning area. Much of the South portion of the planning area are allotted trust parcels and the Northern half of the project is primarily Tribal Fee.

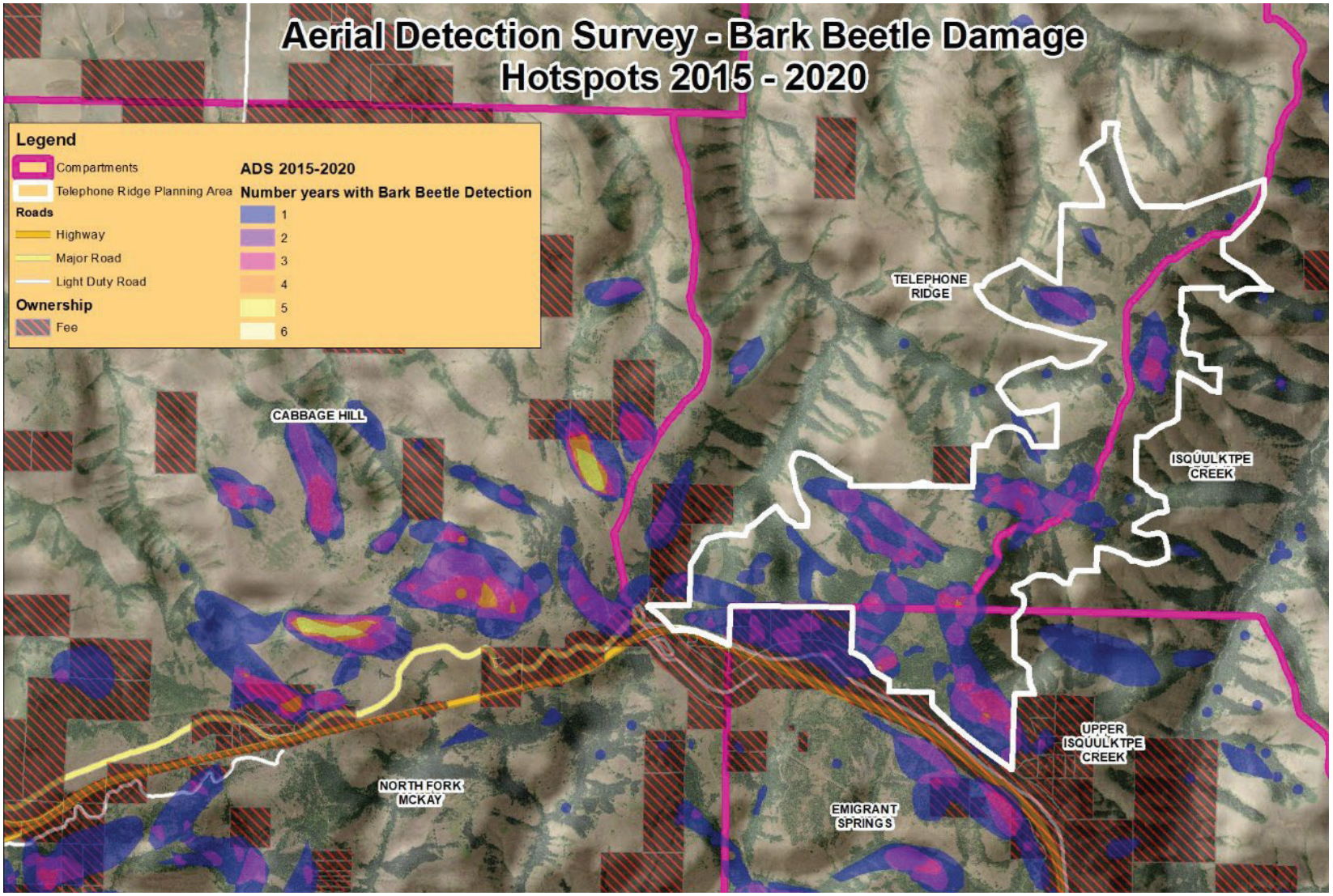


Figure 2: Map showing Aerial Detection Survey (ADS) detections of bark beetle mediated mortality in Telephone Ridge Planning Area and vicinity between 2015 and 2020. Brighter colors symbolize successive years of detections in same area. Note the high amount of bark beetle activity in the Telephone Ridge Planning Area and in the Cabbage Hill compartment to the West. Cabbage Hill contains younger ponderosa pine stands that are less economical for commercial harvest. This compartment will be prioritized for forest health treatment planning in future years.

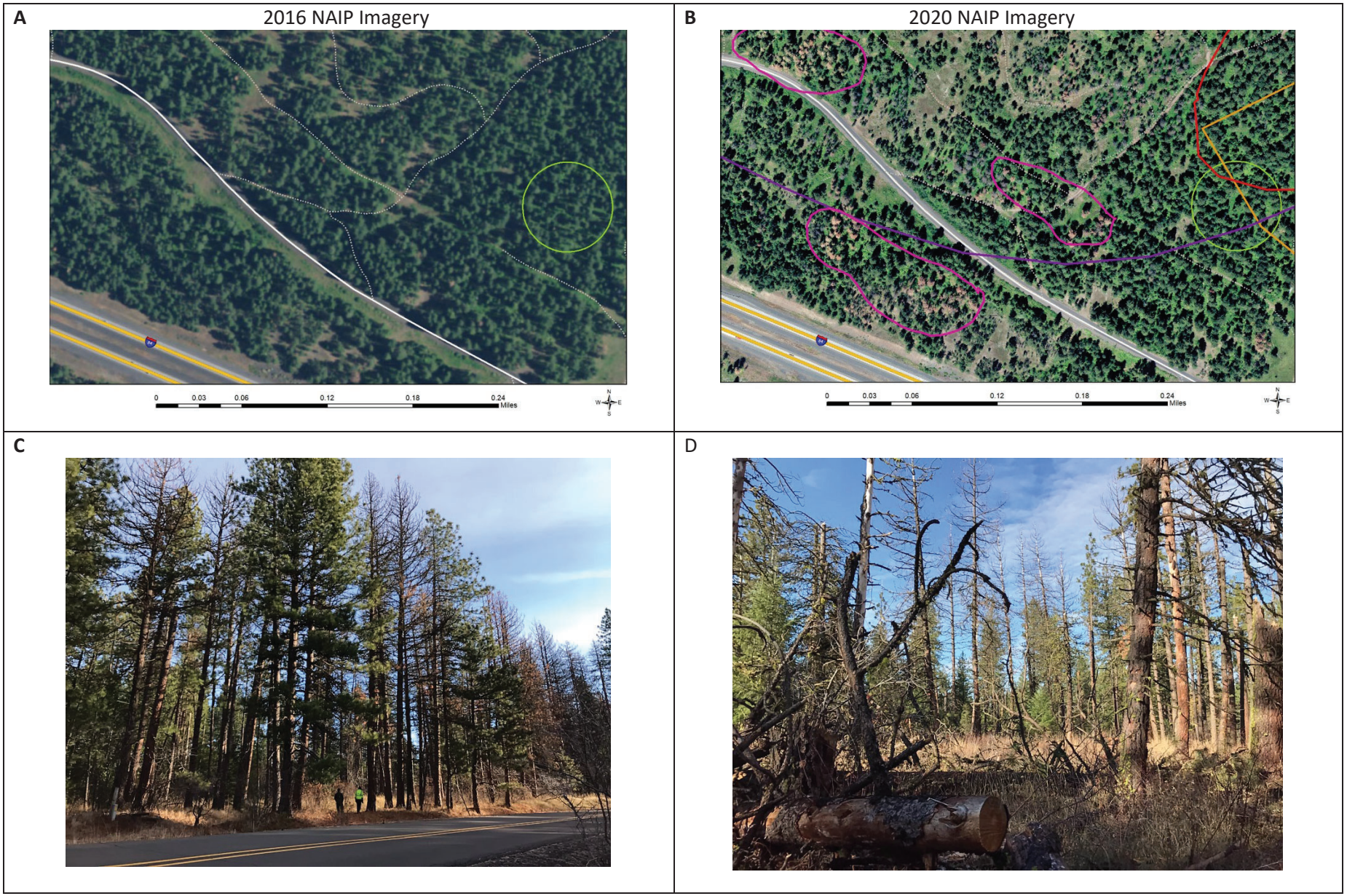


Figure 3: Photos of Representative Forest Health Concerns. Panels A and B show aerial image area of forested area near I-84 from 2016 and 2020 NAIP imagery, respectively (colored lines designate areas of detected beetle activity during aerial survey). Note high amount of mortality that occurred over this relatively short time span. Panels C and D are photos of example on-the-ground conditions taken within this area in 2021

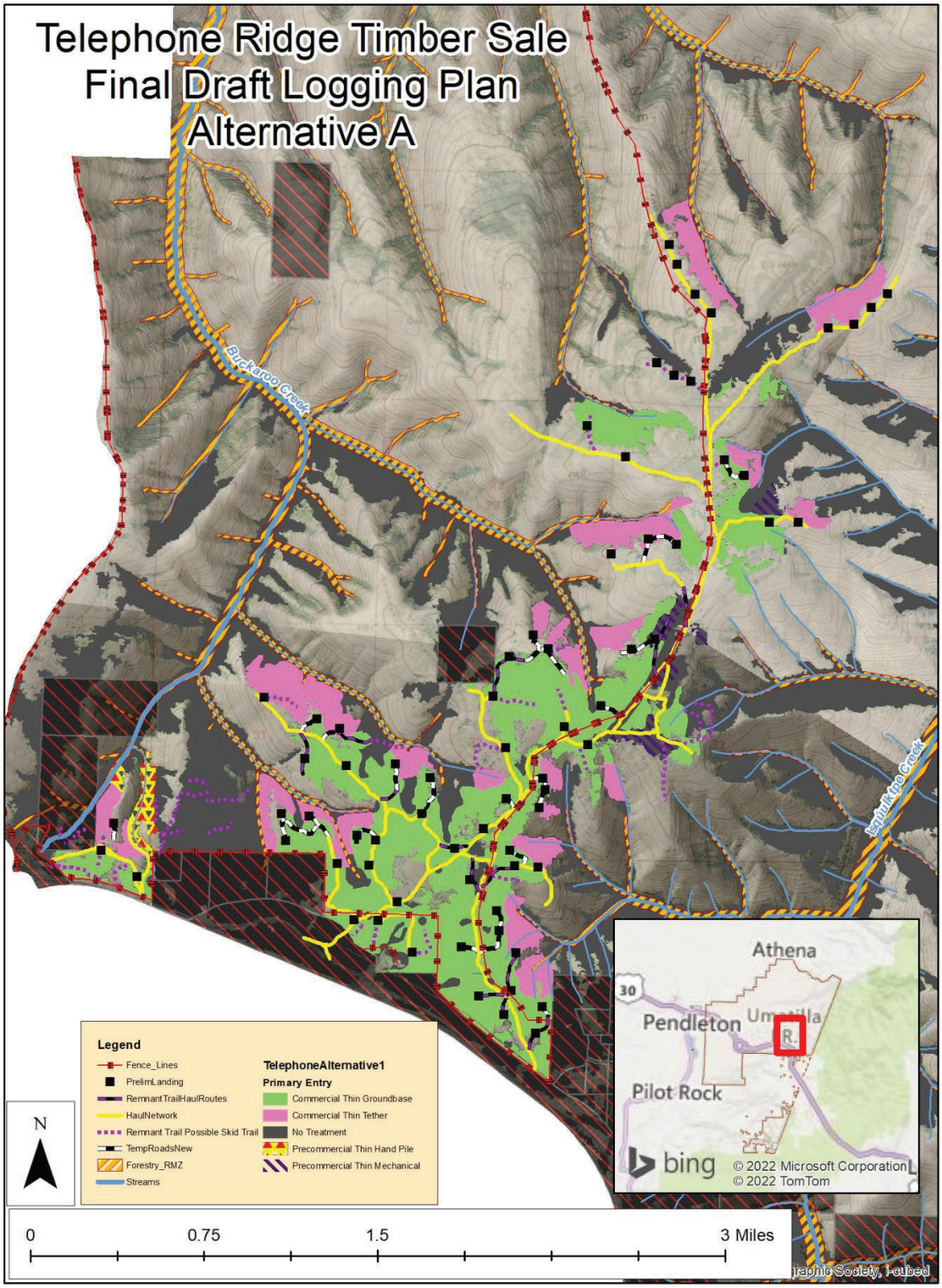


Figure 5: Draft Logging Plan for Alternative A (intended management action). In total, 1033 acres could receive commercial thinning treatment, including 754 acres of groundbase harvest and 293 acres of cable-assist (tether). A road network that includes maintained of 13.2 miles of existing roads, reopening 2.3 miles of derelict trails, and addition 2.8 miles of new temporary spur roads would be required.

***TABLE 1**: Summary of planning area surveyed and proposed treatment acres by parcel. Abbreviations: A- Allotted Trust; T- Tribal Trust; TF-Tribal Fee; PLSS- Public Land Survey System; CT GB- Commercial thin (Ground Base); CT SL- Commercial Thin (Tether Systems); PCT- Precommercial Thinning. Summary acreages are provided by alternative in the final row of table.*

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
A	513	T2N R35E Sec.31	64.0	59.3	41.6	41.6				0.2
A	514	T2N R35E Sec.31	80.0	78.3	71.4	71.4				
A	547	T2N R35E Sec.32	80.0	79.4	53.5	53.5	25.4	16.5		
A	548	T2N R35E Sec.31, 32	80.0	79.1	61.6	61.6	38.2	23.3		
A	550	T2N R35E Sec.32	80.0	79.2	39.6	39.6	33.0			
A	694	T1N R35E Sec.5, 6	61.6	57.1	53.4	53.4	45.7			
A	764	T1N R35E Sec.5	81.0	80.0	55.0	55.0	49.9			
A	765	T2N R35E Sec.31	80.0	78.3	67.7	67.7	45.0	12.6		
A	766	T2N R35E Sec.32	75.0	73.5	50.7	50.7	24.5	6.3		
A	767	T2N R35E Sec.32	80.0	77.9	74.1	74.1	50.4	10.6		
A	768	T2N R33E Sec.3, T2N R34E Sec.14, T1N R35E Sec.6	80.2	40.4	38.5	38.5	31.0	1.3		
A	808	T2N R35E Sec.20, 21	80.0	6.9	4.0	0.1		0.1		
A	890	T1N R35E Sec.5	42.4	29.7	45.6	29.2	26.5			
A	892	T1N R35E Sec.5	58.2	60.1	52.3	52.3	43.7	7.9		
A	893	T3N R35E Sec.31, T2N R35E Sec.6, T1N	86.0	40.0	34.2	34.2	10.9	17.8		
A	896	T2N R34E Sec.4, 21, T1N R35E Sec.5	80.6	39.9	25.7	25.7	18.2	6.0		
A	898	T2N R35E Sec.32, T1N R33E Sec.1	70.4	39.8	26.1	26.1	14.6	0.3		
A	912	T2N R34E Sec.36, T2N R35E Sec.7	80.0	23.1	23.8	16.2		1.2		9.1
A	916	T1N R35E Sec.5	80.7	12.6	39.8	7.2				

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
A	956	T2N R35E Sec.27	80.0	3.6	33.7	0.4				
A	1021	T2N R35E Sec.28	80.0	11.0	34.8	6.1				
A	1178	T2N R35E Sec.22	80.0	36.2	18.5	15.7		12.9		
A	1191	T2N R35E Sec.28, 33	80.0	21.4	9.6	4.6	3.9			
A	1278	T2N R35E Sec.32, 33	80.0	23.3	15.5	10.8		4.3		
A	1043-A	T1N R35E Sec.5	40.0	40.1	40.1	40.1	38.8			
A	1057-A	T1N R34E Sec.1	16.5	16.0	10.9	10.8	9.5			
A	766-A	T2N R35E Sec.32	5.0	4.9	4.9	4.9	4.8			
T	T1017	T2N R35E Sec.33	80.0	40.2	34.9	26.9				
T	T1018	T2N R35E Sec.33	80.0	63.0	18.7	18.7	6.3		4.5	
T	T1125	T2N R35E Sec.21	80.0	42.1	24.2	22.4		18.1		
T	T2110	T2N R35E Sec.20	80.0	14.8	12.0	8.0	0.1			
T	T2111	T2N R35E Sec.17, 21	80.0	8.3	3.4	3.4		2.8		
T	T2121	T2N R34E Sec.36	40.0	39.5	24.9	24.9	0.1	13.3		
T	T546	T2N R35E Sec.31	80.0	78.4	51.3	51.3	22.0	17.6		10.9
T	T884-C	T1N R34E Sec.1	8.1	10.7	5.7	5.7	3.4	1.1		0.5
T	T884-D	T1N R34E Sec.1	18.1	19.9	10.4	10.5	9.1	1.3		
T	T897	T2N R35E Sec.32	80.0	78.8	56.7	56.7	43.2	6.1		

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
TF	TF 0110	T2N R35E Sec. 32	40.0	1.5	0.7	0.1				
TF	TF 0133	T2N R35E Sec. 22	80.0	19.7	20.0	12.9				
TF	TF 0140	T2N R35E Sec. 30, 31	80.0	0.0	6.3	0.0				
TF	TF 4660	T2N R35E Sec. 28	80.0	74.9	42.4	42.6	12.2	9.2	6.6	
TF	TF 4670	T2N R35E Sec. 28, 29	680.0	223.2	213.7	76.9	49.1	33.8		
TF	TF 4690	T2N R35E Sec. 20	80.0	11.9	2.6	2.6				
TF	TF 4800	T2N R35E Sec. 21	80.0	45.3	19.4	19.4		13.0		
TF	TF 4900	T2N R35E Sec. 21	160.0	118.1	42.3	40.8	5.6	0.3		
TF	TF 5000	T2N R35E Sec. 21	160.0	159.0	26.4	26.4	1.3	3.7		
TF	TF 6300	T2N R35E Sec. 28	80.0	74.3	25.9	25.9	2.2			
TF	TF 6400	T2N R35E Sec. 28	80.0	78.5	42.9	42.9	29.8	1.6		
TF	TF 6500	T2N R35E Sec. 28	80.0	77.5	16.1	16.0	10.9	1.9	4.8	
TF	TF 6600	T2N R35E Sec. 28	80.0	13.3	3.8	3.3		3.3		
TF	TF 6800	T2N R35E Sec. 30, 31	224.8	44.9	108.7	38.9		11.5	19.3	
TF	TF 6900	T2N R35E Sec. 31, 32	80.0	79.2	43.3	43.3	3.4	14.7		
TF	TF 7000	T2N R35E Sec. 33	160	156.2	108.5	108.6	40.6	4.8		
TOTAL Alternative A			4732.5	2764.0	1991.7	1620.5	753.5	279.3	35.2	20.7

Confederated Tribes *of the*
Umatilla Indian Reservation
Department of Natural Resources
Cultural Resources Protection Program

46411 Timíne Way
Pendleton, OR 97801
541-276-3447 www.ctuir.org

January 12, 2023

Eirik Thorsgard, Regional Archaeologist
Bureau of Indian Affairs, Northwest Regional Office
911 NE 11th Avenue
Portland, OR 97232-4169

Dear Eirik:

This letter is to inform you of the ongoing work to identify and protect cultural resources prior to proposed forest health improvements on Telephone Ridge on the Umatilla Indian Reservation. The proposed forest health improvements include prescribed burning, commercial thinning, precommercial thinning, tree planting, and access road improvements. The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Range, Agriculture and Forestry (RAF) Program contracted with the CTUIR Cultural Resources Protection Program (CRPP) to conduct a pedestrian survey of the area of potential effect (APE), record any new resources found, and update previously documented resources. Approximately 419 acres of the APE had been adequately surveyed for cultural resources in the last 10 years and were not subject to additional surveys. During the spring and summer of 2022 the CRPP surveyed approximately 1,721 acres, attempted to relocate 25 previously recorded resources, and documented at least 23 new resources. The archaeological report for this work is in progress. RAF will work with CRPP and the CTUIR Tribal Historic Preservation Office to avoid, minimize, or mitigation for any adverse effects to the cultural resources within the APE.

Should you have any comments, questions, or concerns, please feel free to contact me at 541-429-7206 or KristenTiede@ctuir.org.

Respectfully,

Kristen Tiede

Kristen Tiede, Archaeologist

Electronic cc.
Carey Miller, THPO
Andrew Addessi, Supervisory Forester

Environmental Assessment
Telephone Ridge Timber Sale
Confederated Tribes of the Umatilla Indian Reservation

January 2023

Lead Agency:
USDI Bureau of Indian Affairs
Umatilla Agency
P.O. Box 520
Pendleton, OR 97801

Cooperating Agency:
Confederated Tribes of the
Umatilla Indian Reservation
46411 Timíne Way
Pendleton, OR 97801

Responsible Official:
Michael Jackson, Superintendent
Umatilla Agency
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(541) 278-3786

For Further Information Contact:
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Prepared by:
Confederated Tribes of the
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Contents

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1. Purpose and Need

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR), in cooperation with the Bureau of Indian Affairs (BIA), is proposing to conduct a commercial thinning (timber sale) and associated forest health and fuels treatment activities on forest stands contained within portions of Telephone Ridge, Isqúulktpe Creek and Upper Isqúulktpe Creek forest compartments within the Umatilla Indian Reservation (UIR). This area is collectively called Telephone Ridge and is roughly the upland area within the UIR boundary that is bounded by Buckaroo Creek to the West, I-84 to the South, and Isqúulktpe Creek to the East.

The federal action (40 CFR 1508.18) is the BIA approval of the Telephone Ridge Timber Sale on the Umatilla Indian Reservation, which triggers BIA compliance with the National Environmental Policy Act (NEPA; 42 USC § 4321-4375) and associated regulations (40 CFR 1500-1508, 43 CFR 46). This Environmental Assessment is prepared to meet the BIA's NEPA responsibilities. The purpose of the action is to be able to implement the tribal activities under the federal action to meet the primary needs of maintaining quality First Foods habitat, forest health, wildfire risk mitigation, and revenue for the Tribe.

The proposed activities include commercial thinning, precommercial thinning (mechanical and/or hand), prescribed fire, and planting. All proposed activities incorporate forest management goals and objectives and adhere to the standards and guidelines specified in the CTUIR Forest Management Plan (FMP). The FMP was developed by a CTUIR and BIA Interdisciplinary Team and approved by CTUIR's Board of Trustees (Resolution No. 10-022) in 2010. Also in 2010, the BIA prepared an Environmental Assessment for the FMP and issued a Finding of No Significant Impact. Therefore, this EA is directly tiered to the FMP Environmental Assessment.

1.1 Telephone Ridge Planning Area

Development of the proposed project initially involved evaluating all forested portions of tribally owned properties (whether Allotted Trust, Tribal Trust, or Tribal Fee) within Telephone Ridge that were feasible for vegetation treatment given access and logging system constraints. Impacts to adjacent range/scab lands were also to be considered in connection with building of temporary roads/landings and prescribed fire. Units that would require extensive road work on side slopes, across private lands, within protected stream management zones, or otherwise would require helicopter removal were excluded from preliminary consideration for treatment. The remaining area with potential for treatment in connection with this project were initially provided to CTUIR's Tribal Historic Preservation Office for archaeological survey and consultation. This area will collectively be referred to as "Telephone Ridge planning area" or "planning area" through the remainder of this document. No treatments described in the remainder of this document will occur outside of this planning area.

In total, 1621 forested acres were originally analyzed for treatment in this planning area. An additional 1143 acres of adjacent unforested acres were surveyed and considered for potential impacts for a total of 2764 gross acres surveyed in planning area. (Figure 1)

There is a patchwork of mixed tribal ownership within the Telephone Ridge planning area. Of the 53 parcels that included acreage within the planning area, 27 are Allotted Trust, 10 are Tribal Trust, and 16 are Tribal Fee (See Appendix A, Supplemental Table ST2).

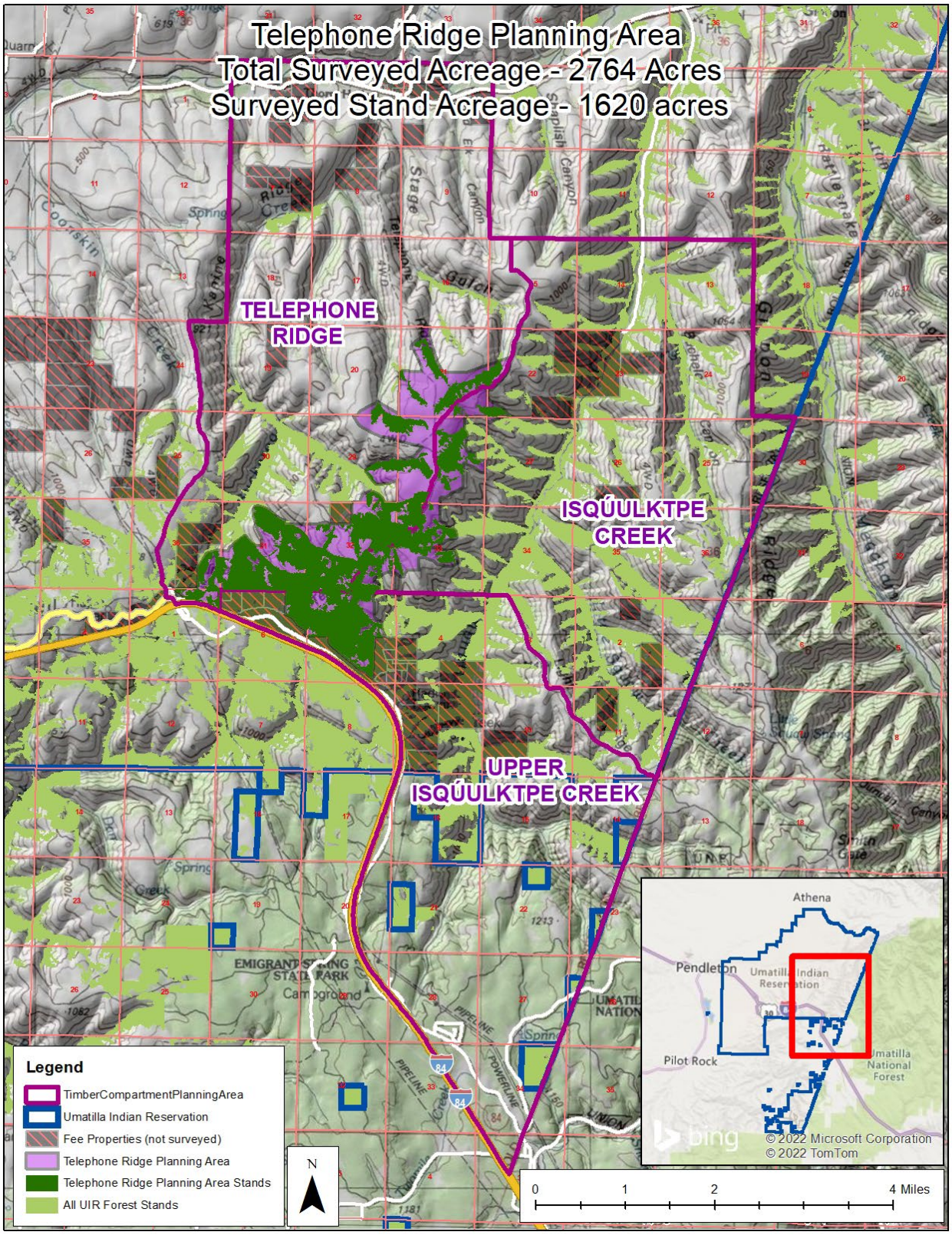

Figure 1: Map of Telephone Ridge planning area in relation to Umatilla Indian Reservation Boundaries and CTUIR Forest Management Compartment Boundaries. A large amount of forested areas in these compartments are in steep rugged canyons along Iskquulktpe Creek and Buckaroo Creek. There are limited options for active management in many of those stands.

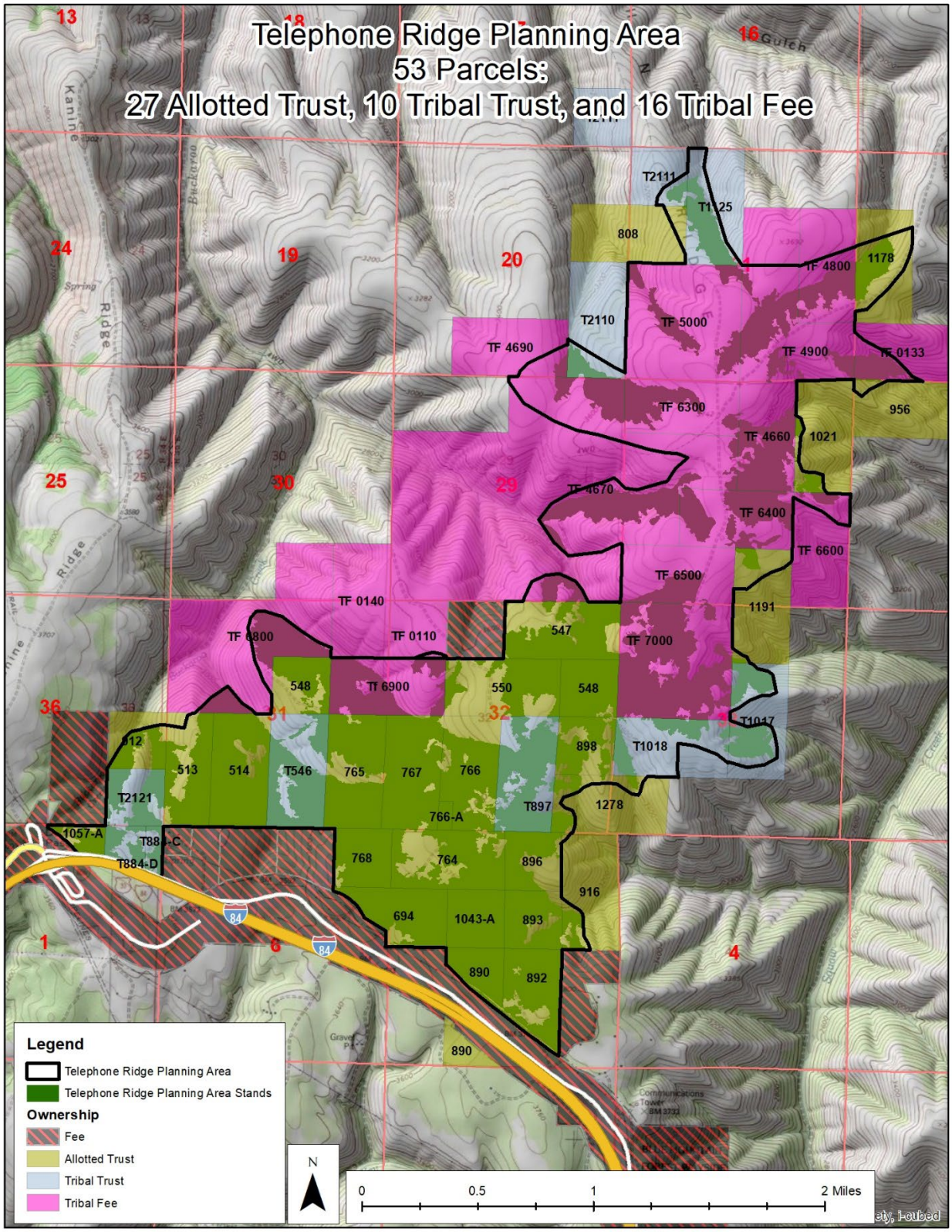

Figure 1: Map of land ownership designation within planning area. Much of the South portion of the planning area are allotted trust parcels and the Northern half of the project is primarily Tribal Fee.

1.2 Current Condition of Forest Stands in the Telephone Ridge Planning Area

Forested stands occur at elevations between 3000-3800 feet ASL. Stand types are generally dry/warm ponderosa pine and ponderosa pine/mixed conifer stands along upland plateaus. These transition into moist mixed conifer stands along shallow topographic depressions that build into headwater tributary canyon bottoms. Steep topography is present along slopes that descend into headwater canyons. Steep north and east facing aspects contain grand fir and Douglas-fir dominated mixed conifer stands. Scab flat plant communities are interspersed in steep areas with a predominant west and south exposures or in flat areas of shallow rocky soils.

There has been a relative lack of recent wildfire disturbance in this planning area, despite these forest types historically supporting a frequent low intensity surface fire regimes of 0-50 year fire return intervals[1]. The Cayuse fire of the 1960's may have impacted small sections of the planning area but there is no recorded evidence of other large wildfires within this planning area in recent history.

Past harvest activities on many of the included allotted trust properties occurred through BIA forest management projects of the preceding century. The McKay Timber Sale of 1952-1956, and an additional set of projects in 1982-1983 included much of the allotted land base. There were a few individual allotment sales initiated during the late 1990's as well. The Tribal Fee properties were generally all acquired from a single previous landowner in the early 2000's, funded through Bonneville Power Association habitat mitigation settlements. Varying intensities and timelines of past timber management during previous ownership are evident. These Tribal Fee properties have been co-managed by CTUIR Range, Ag, and Forestry program and CTUIR Wildlife Program since their acquisition. In 2018-2021, prescribed fire and limited hand thinning had been implemented on portions of these Tribal Fee properties through a BIA Reserved Treaty Rights Lands grant program. However, commercial sized trees were not altered in these treatments and it was recognized that reduction in large tree density would be required to improve stand health, first foods habit, reduce wildfire risk and support future prescribed fire management.

Given the history of economically focused/high-grade logging approaches of the mid-20th century, lack of recent timber management, and wildfire suppression policies that have precluded a natural fire regime; stands across the planning area have departed from historic conditions.

Data from CTUIR past forest inventory efforts support evidence that nearly all stands in the planning are currently far in excess of recommended stocking levels for these ponderosa pine and mixed conifer forest types (See Supplemental Table ST1). Many stands are approaching the theoretical maximum stocking levels (100% of maxSDI), for ponderosa pine in their respective plant association[2] types. The CTUIR FMP follows

[1] Juran, Ashley G. 2017. Fire regimes of conifer forests in the Blue Mountains. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Missoula Fire Sciences Laboratory (Producer). Available: https://www.fs.usda.gov/database/feis/fire_regimes/Blue_Mts_conifer/all.html

[2] Johnson, C. G., and R. R. Clausnitzer. 1992. Plant associations of the Blue and Ochoco mountains. U.S. Forest Service, Pacific Northwest Region, Wallowa-Whitman National Forest R6-ERW-TP-036-92.

Powell 1999[3] density guidelines and recommends maintaining stocking densities be between 30-50% of max SDI for Ponderosa Pine. In other terms, most stands in the Telephone Ridge Timber Sale are carrying between 1.5x-3x the density of trees than are recommended for their sites. Mixed conifer stands contain a high proportion of late-successional, shade tolerant tree species while pine stands contain a high proportion of suppressed mid-sized ponderosa pine trees with poor form and vigor.

Overstocked conditions predispose stands to high levels of endemic mortality and also periodic cycles of heavy mortality due to the compounding impacts of drought, insect pressure, and other forest pathogens. More trees means less water is available to each living tree, and trees require adequate moisture to support their growth and defense mechanisms. Chronic and acute water stress impacts are expected to escalate across the intermountain west in a future with a hotter and drier climate[4].

Forest health in the stands within the Telephone Ridge planning area have quickly deteriorated in recent years. Large patches of beetle activity have been evident since the mid 2010s and quickly escalated over the subsequent years, peaking in 2018-2020 (Figure 2). This timing coincides with prolonged droughts and record heat in the inland Northwest during many of these years. Western pine beetle and pine engraver (*Ips pini*) are the main insect agents evident, preying on both large and small diameter ponderosa pine, causing wide scale mortality and top-kill of ponderosa pine in over-dense stands. Large patches of dead and dying trees, primarily intermediate and codominant ponderosa pine trees, are evident in many of the drier stands in the planning area. Other disease issues contributing elevated levels of morality include evidence of root rot centers (predominantly *Armilaria spp.*) in moist mixed conifer sites, especially effecting Douglas-fir and grand fir. Severe mistletoe is prevalent on many of the Douglas-fir and the few scattered western Larch in these mixed conifer stands.

The buildup of live ladder fuels and dry and dead heavy surface fuels is concerning given the high likelihood of a human-caused or natural wildfire event. This area is considered a Wildland Urban Interface (WUI) as it borders a major transportation corridor (I-84 Interstate) as well as a number of home sites and major utility infrastructure (powerlines, gas pipelines, cell towers). Current stocking levels and stand structure are such that a large stand-replacing wildfire is more likely to carry throughout much of the compartment if an ignition occurred during dry summer months. Stand conditions are similar on adjacent ownerships including state and private lands that abut the I-84 interstate highway, but CTUIR does not directly manage these stands.

Maintaining healthy stand conditions more resilient to future climate and wildfire disturbance is one measure to protect first foods habitat and mitigate catastrophic loss of tribal and public resource values in an uncertain future. Timely forest management in this planning area is therefore recommended to reduce density and continuity of live trees, reduce accumulated dead surface and ladder fuels, maintain healthy stand densities and structures, and to mitigate lost timber value for Indian landowners whose timbered stands have been effected by elevated levels of mortality.

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[3] Powell, D.C. 1999. Suggested Stocking Levels for Forest Stands in Northeastern Oregon and Southeastern Washington: An Implementation Guide for the Umatilla National Forest. USDA Forest Service Umatilla National Forest Technical Publication F14-SO-TP-03-99. Pendleton, OR.

[4] Kolb, T. E., Fettig, C. J., Ayres, M. P., Bentz, B. J., Hicke, J. A., Mathiasen, R., ... & Weed, A. S. (2016). Observed and anticipated impacts of drought on forest insects and diseases in the United States. *Forest Ecology and Management*, *380*, 321-334.

Telephone Ridge has been a high priority for treatment since the early detections of large-scale mortality around 2017, however, many of the surrounding CTUIR timber compartments were also in need of timely treatment at the same time. CTUIR has been steadily implementing similar thinning treatments through large blocks of tribal forest land along the I-84 WUI at the fastest possible rate given staff and administrative capacity of CTUIR. To date, stands within compartments immediately South of I-84 have been undergone thinning treatments through the Emigrant Springs timber sale (2018-2020), and North Fork McKay timber Sales (2021-2022).

1.3 Goals and Objectives of this Restoration Activity

Goal 1- Sustain and promote First Foods: Create a vegetation structure which will protect water resources, provide quality habitat for elk, deer, and other wildlife species, and improve environmental conditions for huckleberry, Indian carrot, and other medicinal plants which respond positively to some removal of overstory canopy.

Objectives for Goal 1:

A. Water quality will be protected by not harvesting any commercial trees from within floodplains or inner riparian management zones of any creeks in the proposed project area.

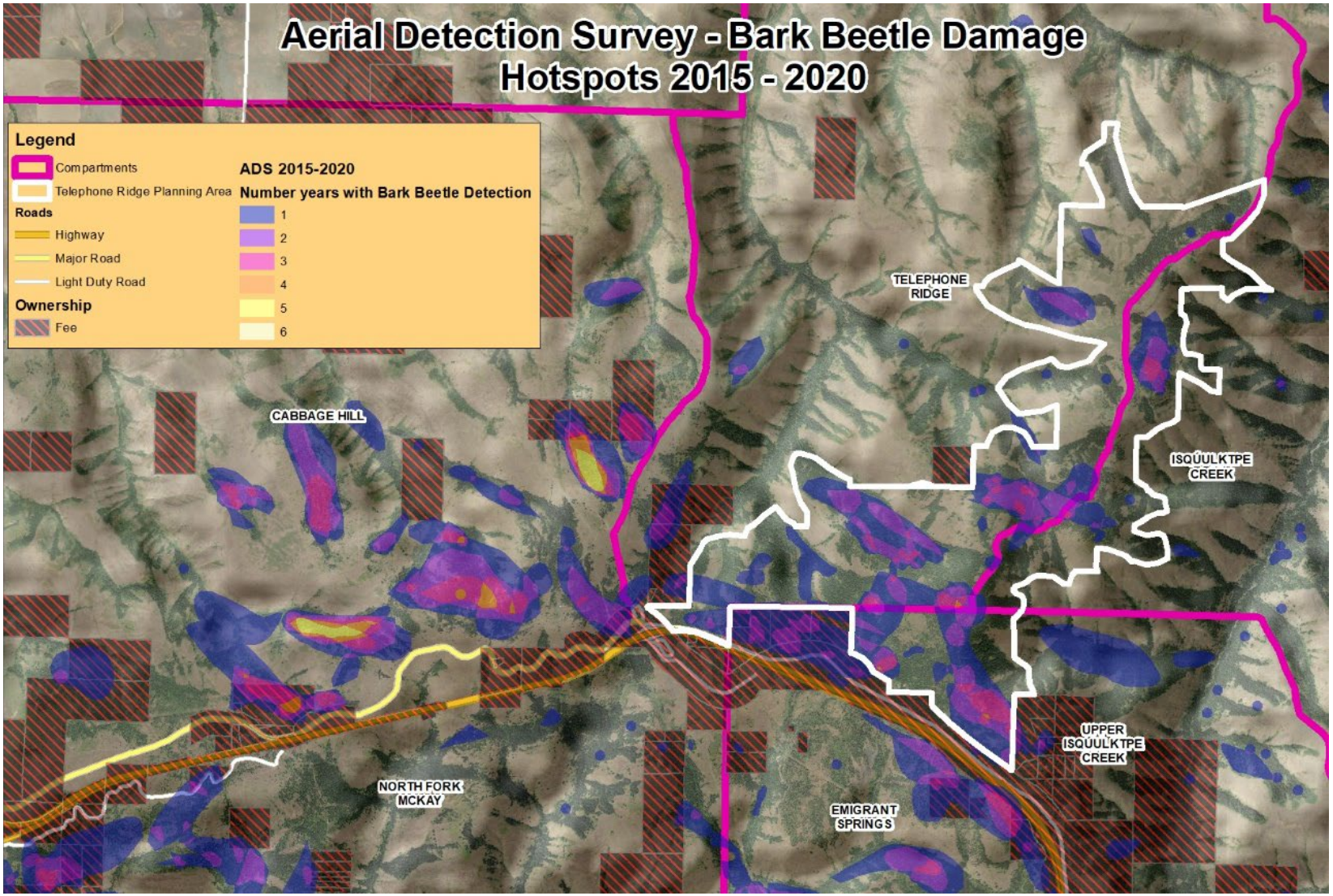
    - Riparian Management Zones equal to 75 feet horizontal width times the stream order (modified Strahler) plus the floodplain will be established on each side of all streams (Figure 3). No commercial harvest or equipment crossing will occur in the inner half of this Riparian Management Zone. Limited harvest and entry can occur in the outer half of the RMZ. The intent is to maintain potential shade for the site, buffer sediment delivery to streams, provide wood recruitment to the floodplain and stream channels, and retain high quality cover for wildlife. RMZ buffer width will be doubled adjacent to Mid-Columbia Steelhead Critical Habitat.

B. The vegetation structure following this operation will provide adequate cover for elk and deer, and will provide intermediate canopy cover which enhances late summer forage.
C. Reduction in fuel densities will promote stands resilient to future wildfire events, reducing the likelihood of extreme stand replacing fire events that would generally degrade habitat for key first food species or could lead to mass erosion of heavily burned hillsides.

Goal 2- Improve general forest health: Most of the forested stands in the Telephone Ridge project area are highly susceptible to and already experiencing drought-related mortality and insect and disease outbreaks (mainly bark beetle, dwarf mistletoe, and armillaria root disease).

Objectives for Goal 2:

A. Stand density indices will be reduced to within desired management zones (~30%-50% of Ponderosa Pine SDI_{max}) of each stand according to individual average stand diameter for uneven aged stands by plant association. These stand densities will be more resilient in future drought conditions and likely able to resist future insect outbreak events.
B. Root disease and Dwarf mistletoe centers will be cleared of the most susceptible conifer species (grand fir and Douglas-fir) and will be planted with more tolerant species (primarily ponderosa pine).



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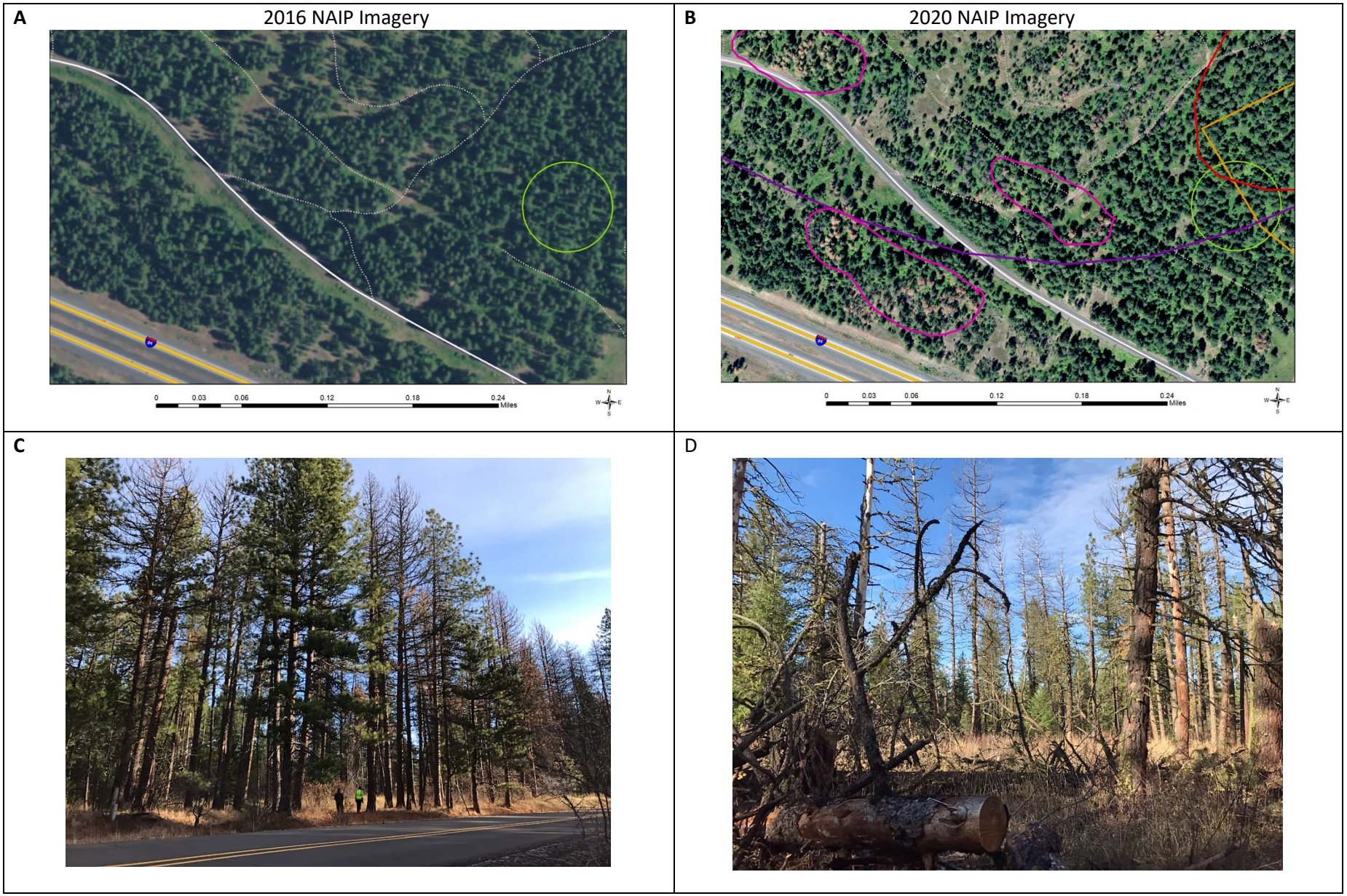

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Goal 3- Reduce wildfire danger: Create a vegetation structure which lessens the probability of stand replacing wildfire and provides conditions for hand crews to safely carry out wildfire suppression and prescribed fire activities.

Objectives for Goal 3:

A. Shift species composition to a majority of fire resistant species (ponderosa pine, western larch, and Douglas-fir)
B. Create a vegetation structure which is less likely to support torching and crown fires.
C. Retain individual trees of good form and health with attributes resistant to mortality during wildfire (thick bark, high height-to-live crown)

Goal 4- Provide income to beneficial owners and support the local timber economy: Market commercial sized timber that will be cut in this operation to log buyers in the PNW region.

Objectives for Goal 4:

A. Provide beneficial landowners with the highest price for timber sold.
B. Market all merchantable timber for sale on the open market.
C. Market commercial material produced in this operation to log buyers in the PNW.

2. Alternatives

2.1 Alternative A – Full Implementation of Forest Management Plan Density Reduction Approach in All Eligible Overstocked Stands

Stand density will be managed to maintain high stand vigor and uneven-aged structure in all stands accessible for treatment and that are not otherwise precluded for treatment based on other resource objective conflicts. Proposed management activities include commercial thinning, precommercial thinning (mechanical and/or hand), prescribed fire, and planting, with multiple treatments occurring sequentially in the same stands. The objective is to maintain stand density within the values established for the upper and lower limits of the ponderosa pine density management zone as defined in the CTUIR FMP and developed in Powell, 1999. A mosaic of structural and successional stands will be maintained over the landscape which will result in an uneven-aged forest structure. In order to promote disease and fire-resistant stands, healthy trees of early seral species such as ponderosa pine, western larch, and Douglas-fir are favored for retention. Late seral species, notably grand fir, are favored for harvest in mixed conifer stands. Grand fir is a more disease-prone species and can contribute a dense understory of regenerating trees that makes a high-intensity canopy fire more likely during a fire event.

In total, as much as 1033 acres of the original 1620 acres in the planning area will receive a commercial thinning treatment (Figure 3). Of these acres, 754 acres are suitable for low-complexity ground-based logging equipment. An additional 279 acres occur on slopes between 40-100% and would require cable-assist (tether) logging equipment to harvest. Trees will be selected for harvest from all merchantable size classes (greater than 9” in diameter) to meet stand objectives.

Some stands in the planning compartment with insufficient merchantable volume to include in the commercial thin are designated for precommercial thinning work as a primary entry to reduce stocking to appropriate

densities and promote disease-resistant and fire-resilient species composition. We have identified approximately 35 acres of stand-alone mechanical PCT (mastication) and another 21 acres of hand thinning/piling to be implemented in the planning area in areas where no commercial thinning is proposed.

Several stands or portions of stands within the original planning area will receive no treatment. Reasons for no treatment include stands within or requiring crossing inner riparian management zones, near identified resource sites (e.g., cultural sites, springs, home sites), with unfavorable terrain for logging equipment, or otherwise have high value as wildlife hiding and thermal cover. There was also a significant block of area that must be excluded for management without a formal agreement with private land owners whose properties constrain access. At the time of writing this environmental analysis, an access agreement is unlikely to be secured with these landowners. Additional acres that must be removed from treatment due to newly identified resource sites in the forthcoming CTUIR THPO report will also be omitted from final logging plans. In total, at least 513 of the 1621 acres within the planning area will receive no thinning treatment due to these concerns.

Beyond the footprint of this project, a large amount of acreage in these forest compartments will receive no thinning treatment and are unlikely to be eligible for active management in the future due to terrain/access issues (see Table 1 below, and Figures 1 and 3). This was recognized in the CTUIR FMP and because of this much of the Isqúulktpe Creek Watershed is considered a Special Management Area. Natural disturbance in the form of insects, disease, drought, and wildfire will drive future succession in these stands.

Table 1: Summary of Treatment Acreages within Planning Compartments. This table shows that the majority of the forested area within these planning compartments are outside the bounds of this project and will be untreated following the proposed activities. Significant acreage in all three compartments is in steep, rugged terrain with limited opportunities for active timber management.

Compartment	Compartment Gross Acres	Compartment Total Forested Acres	Compartment Forested Acres Within Planning Area	Commercial Thin or PCT Treatment Acres	No Treatment Forest Acres in Planning Area	% of Compartment Total Forested Acres Receiving Thinning Treatment
Telephone Ridge	11131	1750	991	626	365	36%
Isquulktpe Creek	10377	3228	294	184	110	6%
Upper Isquulktpe Creek	8883	2311*	336	298	38	13%

**A significant portion of Upper Isqúulktpe Creek Compartment extends outside of the Umatilla Indian Reservation Boundary. While gross acres includes this area, the forested acres on off-reservation private lands has not been delineated, and so is underrepresented here. The percent of forested acres receiving thinning treatment in this compartment would be an even lower percentage if those off-reservation private lands were included in this calculation.*

A draft logging plan for Alternative A is provided in Figure 3 showing location of proposed treatments and access routes. A summary table indicating treatment acreage by ownership type is provided in supplemental table ST2.

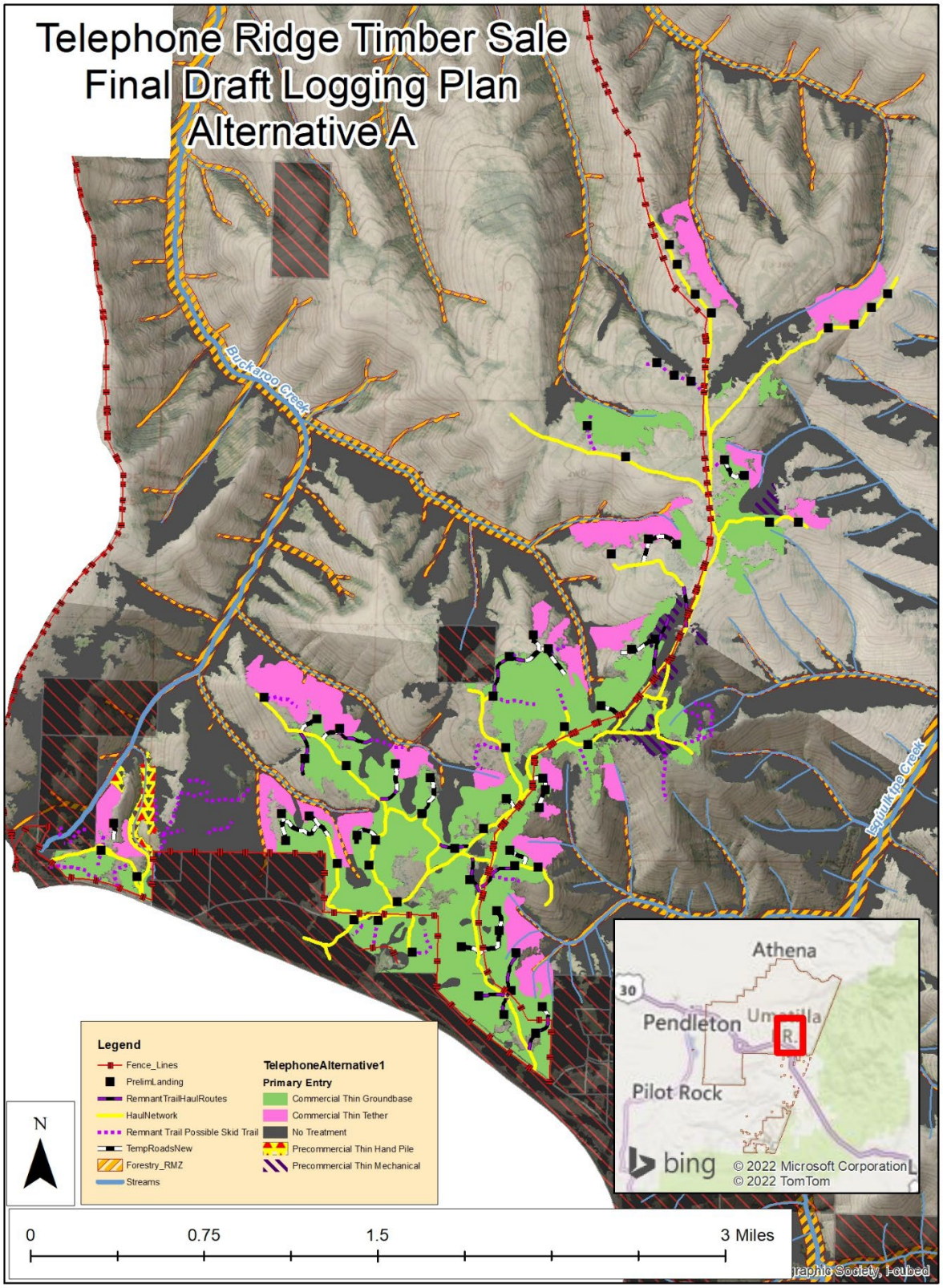

Figure 5: Draft Logging Plan for Alternative A. In total, 1033 acres could receive commercial thinning treatment, including 754 acres of groundbase harvest and 293 acres of cable-assist (tether). A road network that includes maintained of 13.2 miles of existing roads, reopening 2.3 miles of derelict trails, and addition 2.8 miles of new temporary spur roads would be required under this alternative.

Timber stand improvement (TSI), reforestation, and prescribed fire

Following commercial thinning, all units will be considered for a follow-up Timber stand improvement (TSI) treatment to guide the succession of the stands toward desired future conditions. TSI involves precommercial thinning of small diameter (less than 9") trees, either by hand crews or with mechanical equipment (mastication). This TSI work is necessary to remove thick patches of shade tolerant conifer regeneration too small for commercial harvest, to promote growth of disease-free and defect-free early successional conifers, and to generally reduce the likelihood of a stand-replacing wildfire event by reducing ladder fuels and creating gaps between tree canopies. TSI work also supports prescribed fire implementation by reducing likelihood of group torching or other holding concerns. TSI needs will be assessed on a stand-by-stand basis, some stands may be withheld from follow-up TSI work if understory densities are already in desired condition, or there are benefits to other resource objectives (e.g. wildlife cover) to retain high densities. TSI will generally be performed by hand crews performing lop and scatter or pile thinning. Some stands that retain very high understory densities or excessive surface fuels may be proposed for mechanical thinning (mastication).

Prescribed fire is planned as a secondary treatment following thinning in much of this planning area. Burning of landing piles and hand thin piles will occur within 1-2 years of their creation. Additionally, low-complexity broadcast burning will be considered for stands following thinning. Broadcast burning is an important forest management tool in these dry forest systems, emulating low-to-moderate wildfire/traditional fire effects which would have occurred in these stands prior to fire suppression policies of the preceding century. These dry ponderosa forest types co-evolved with regular fire return intervals of 0-50 years[5]. Broadcast fire can reinvigorate now decadent shrub communities, improve grazing forage, improve habitat conditions for First Foods, create favorable sites for both natural and artificial tree regeneration, reduce excess surface and ladder fuels that heighten risk of severe fire effects in unmanaged conditions, and enable CTUIR to maintain a more regular low-intensity fire regime through managed burns in the future.

Prescribed broadcast fire will be considered for as much of the relatively flat acreage as is feasible. Prescribed fire units will be designed so that implemented burns will spread outside of the planning area, with an emphasis on making use of logging roads and skid trails for holding perimeters. Broadcast burning of steep areas will be limited due to holding concerns. Any resource sites that require protection from fire will be excluded. Final units and acreage will be determined following the thinning entries. It is expected that between 500-700 acres of the planning area, including both forest stands and their immediate perimeters in open scab flat areas, could receive prescribed broadcast burn treatments.

CTUIR forestry staff anticipate some artificial regeneration following the commercial harvest operations. While the thinning approach seeks to retain fully stocked stands, the forestry program will identify patch cuts larger than 2 acres due to insect and disease centers or large scale removal of grand fir. These patches will be planted with ponderosa pine (and Douglas-fir and/or Western larch where appropriate) and will be monitored for 5 years to ensure full stocking. Site preparation for reforestation efforts will depend on regeneration method and plant

[5] Fryer, Janet L. 2018. Pinus ponderosa var. benthamiana, P. p. var. ponderosa: Ponderosa pine. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Missoula Fire Sciences Laboratory (Producer). Available: www.fs.usda.gov/database/feis/plants/tree/pinponp/all.html

association, but could include prescribed fire, mechanical slash treatment, and spot spraying of approved chemical herbicides.

Silvicultural Method

Single tree selection (emphasizing removal of individual or small groups of undesirable trees) is used as the silvicultural method for promoting early seral species of multiple size class trees. An emphasis will be made to leave large diameter (>24" DBH) early seral species, and especially retain the largest healthy trees in each stand. Individual trees were marked in spring summer of 2022 in anticipation of this project. Stands were marked for retention ("leave tree mark") or removal ("cut tree mark") based on the following criteria:

Marking Criteria:
When deciding on whether a particular tree should be retained, the surrounding trees should be considered in order to leave the most desirable species with the best health.

The following are traits of trees that should NOT be marked to retain.

1) Diseased (Least indication to retain)
    a. dwarf mistletoe
    b. root disease
    c. bark beetles
    d. heart rot / stem canker
2) less than 40% live crown
3) forked top
4) other physical defect, such as bent or deformed bole (Low Indication to retain)

Species preference- Of the healthiest trees in the vicinity, retain trees in the following order of species preference until the desired basal area of the stand is achieved*:

1) Western larch (Most Preferred species to retain)
2) ponderosa pine
3) Douglas-fir
4) Engelmann spruce
5) grand fir (Least Preferred species to retain)

*Stocking levels within an area may be lower than desired post-thin basal area if disease centers (dwarf mistletoe, root disease, etc.) are present and all infected trees need to be marked for removal.

Large diameter trees (>24.0" DBH) or trees that show old growth characteristics should generally be retained unless there is a high indication to remove, very low species preference, or a stand is over represented by this age/size class.

Ignore any trees smaller than 8" DBH or snags in this marking prescription.

As a result of this marking criteria, the healthiest available trees of good form, particularly early successional species, such as ponderosa pine and western larch, will preferentially be retained until the target stocking level is reached for the stand. Powell (1999) is the primary reference used to help develop target stocking levels for each

stand, according to the stand's plant association group. Inevitably, nearly all stands had a target basal area that overlapped the range between 60-100 sq. ft., and this was used as a general rule of thumb while selecting healthy trees for retention across stand types. (See supplementary table ST1).

The FMP suggests deferring the harvest of trees greater than 21 inches diameter. However, the retention of all trees with diameters over 21 inches would result in many stands having a more even or dual cohort structure and would result in excessive basal area in most stands. Further, a high proportion of trees between 18-24 inches in diameter are intermediate or codominant with even larger neighboring trees and have developed poor form or crown structure (either by suppression, past injury, or genetic defect). Many ponderosa pine trees in these size classes have recently succumbed to bark beetle mediated mortality. Diseased and defective trees 18-27" in diameter were therefore selected for harvest in favor of a wider distribution of healthy trees across diameter classes. Very large diameter ponderosa pine (27"+) will generally all be retained to promote fire resilience and to bring stand structure closer to the historical range of variability for mature dry forest sites and to retain recruitment of high quality snags for wildlife in the future. Medium-to-large diameter grand fir and Douglas-fir with severe mistletoe or in vicinity of root rot pockets will be preferentially removed in order to accomplish the primary objective of creating and maintaining healthy conditions and resistance to mortality and to limit the regeneration of grand fir in treated stands.

To reduce future standing and surface dead fuel loads, commercial sized snags less than 24" in diameter will generally be removed across commercial thinning units. Retention of all snags 24" and greater in diameter will be adequate to maintain snag levels within the historic range of variability. These large diameter snags also have the greatest value for snag-dependent wildlife species. Existing snags in untreated areas will further contribute to residual snag densities, and it is assumed that following harvest there will continue to be a high number of snags recruited in the near future as a result of continued bark beetle pressure on the residual stand (which will hopefully abate over time). Old snags and snags with unique features in thinning units will also be specifically identified for retention.

The marking criteria described above was applied to all merchantable stands suitable for groundbase logging in Spring/Summer of 2022. To expedite layout and limit hazard to field crews, steep units were not marked as these stands are highly overgrown with tall decadent brush (primarily Mallow ninebark, *Physocarpus malvecus*) which make layout on these steep slopes very time consuming and dangerous. Given the success on recent project working with tether-based equipment operators to implement similar silvicultural prescription, it was determined that a designation-by-prescription using the above marking criteria could be implemented successfully. Equipment operators would make cutting decisions based on this prescription and receive regular CTUIR forestry staff oversight to ensure marking criteria are followed and thinning objectives achieved.

Harvest Volume/Post-treatment Stand Structure

Following marking, a pre-harvest timber cruise was applied. This was done to achieve BIA standards for estimating volume of timber sale contracts in anticipation of advertisement of the Telephone Ridge timber sale. This data also helps provide updated baseline information to better determine loss of stand volume due to recent mortality, which would not have been adequately assessed in pre-existing inventories collected in the early 2010s.

This updated data also helps to evaluate how closely post-treatment stand structure will meet desired conditions[6].

To support a simplified analysis of stand condition both pre and post-harvest, the large number of stand types in this project area were aggregated into 5 larger stand strata of similar stand types/densities. Cruise plots were distributed across these 5 strata (supplemental figure S5). These 5 strata are Ponderosa Pine Medium density, Pine-Mix Medium Density, Pine Mix High-density, Mixed Conifer high density, and Steep Mixed Conifer. Summary stand charts and visualization of pre and post treatment conditions are presented in supplemental figure S6, (visualizations produced using Forest Vegetation Simulator, USDA)

As a result of treatments provided in Alternative A, the estimate of cut-volume is ~6.0MMBF of sawlogs (net) and an additional 1.5 MMBF of pulp material from standing dead and defective sections of sawlog trees (Table 1, below). This accounts for around 40% of the decadal allowable cut total for the decade of 2020-2029 (18.5 MMBF). Predicted stumpage value returned to CTUIR landowners would be between $1-$1.5 million dollars.

Table 2: Estimated volume harvested under Alternative A, based on pre-harvest timber cruise. It is expected that this harvest could generate ~$1-$1.5M dollars net (stumpage) for landowners (CTUIR and Allottees). Pulp is estimated in both units of weight (tons) and converted to thousand board feet (MBF) for easier comparison with sawlog volume. Pine is separated into 4 diameter sorts (6-11", 12-17", 18-24" and 24"+) as mills pay premiums for higher diameter pine logs. All other species are camp run (no diameter breakdown). DF- Douglas-fir, WL- Western Larch, PP – Ponderosa Pine, GF- grand fir.

	Net BF	Net MBF
DF/WL	2615868.50	2616
PP6-11	796406.52	796
PP12-17	1098754.61	1099
PP18-24	352109.92	352
PP24+	45017.45	45
GF/other	1103214.65	1103
Total Sawlog	6011372	6,011.37
	Tons	MBF*
Pulp	8327	1486.96
Total All	7498336	7498.34

Slash and fuel treatments

Cut trees shall either be whole tree yarded or limbed and processed at the point of origin (at the stump). For pine engraver (*Ips pini)* beetle mitigation, all pine slash greater than 3" in diameter that is generated between January

[6] One caveat in this analysis is that much of the layout work and cruise work was performed with assistance of a Timber Strike Team employed by Bureau of Indian. Due to constraints on BIA staff working on non-trust lands, no pre-harvest cruising occurred on Tribal Fee lands. Estimates of pre and post-harvest stand structure were extrapolated to stands on Tribal Fee lands from similar stand types cruised on trust lands, and cross verified with existing stand data from earlier surveys.

and July shall be piled in the unit or at landings by the purchaser for burning by the CTUIR/BIA as part of the cleanup/rehab operations. Machine piling will only be allowed on landings and other compact locations approved by a CTUIR forester. Grapple equipment (loader, excavator, etc. with a bucket and thumb) will be used for piling compact piles, keeping all burnable material separate from non-burnable material. No piles shall be constructed using a bulldozer. Alternatively, cut-to-length systems could be allowed prior to July provided pine slash is masticated to promote drying of inner bark so that material no longer becomes appropriate brooding material for beetles.

Cull sections and other large segments of (non-pine) slash shall be placed in yarding corridors and skid trails to reduce erosion and prevent further unauthorized access. All non-burnable material shall be smoothed to the original land contours. Slash treatments will be accomplished concurrently with other phases of the logging operation and must be approved prior to moving equipment to the next cutting block.

Harvest operations

All harvest operations and the hauling of logs will be limited to dry soils. No hauling activities will be allowed during spring break-up or when moisture conditions are such that excessive damage occurs to roadbeds or soil profiles. No skidding operations will be allowed when soil moisture conditions are such that excessive rutting (12" deep or greater) will occur. Units within the sale area less than 40% slope are to be harvested with ground-based skidding/forwarding machinery. Steeper ground is planned to be harvested with cable-assist tether harvesting systems, which is similar equipment as ground base except supported by a traction-assist tether housed within an excavator-style anchor machine at the top of the slope. Yarding corridors and skid trails will be authorized by the officer-in-charge prior to yarding trees/logs, and skidders will redeposit some slash in primary corridors to reduce erosion. Logs will be decked in landings near the top of the corridor and/or swung to central landings. All Harvest and slash management will occur outside of designated cultural resource site buffers.

Winter harvest could be allowable during sustained periods of frozen ground and snow cover. However, at the elevation of this project sustained thaws are common through winter and therefore winter logging seasons are unreliable.

No timber harvest will occur within any floodplain. Riparian Management Zones equal to 75 feet horizontal width times the stream order (modified Strahler) plus the floodplain will be established on each side of all streams, where equipment access is not permitted. RMZ buffers will be expanded to double their standard widths for all stands that overlap Critical Mid-Columbia Steelhead habitat.

Due to the possibility of elk using the sale area for calving, mechanized operations planned between May 15th and June 20th may not commence without written permission from CTUIR Wildlife Program. The Wildlife Program will conduct a site visit and survey stands that are planned for harvest during this period at the request of the sale administrator. Forest stands within 0.25 mile of I-84 are exempt from this requirement.

2.2 Alternative B – Limited Steep Unit Harvesting

This alternative shares the same goals, objectives, silvicultural methods, slash and fuel treatment, and TSI as Alternative A. The harvest operations would also be nearly the same, except Alternative B would remove stands for

treatment that would require cable-assist based logging for harvest. This would reduce the amount of landings and haul road infrastructure. It would also result in lower logging costs, and therefore a higher value per thousand board feet of harvested sawlogs over Alternative A. There would be reduced acres treated, reduced harvest volume, and would retain excluded steep stands in their current condition. Due to both economic and administrative challenges to managing isolated stands with complex logging requirements, there would be limited options for economical density management in omitted steep stands in the foreseeable future.

Under Alternative B a result of treatments provided in Alternative A, the estimate of cut-volume is ~3.7MMBF of sawlogs (net) and an additional 0.9 MMBF of pulp material from standing dead and defective sections of sawlog trees (Table 1, below). This accounts for around 25% of the decadal allowable cut total for the decade of 2020-2029 (18.5 MMBF). Predicted stumpage value returned to CTUIR landowners would be between $700k-$900k dollars (higher per volume stumpage rates are expected due to less costly logging methods and reduced road construction costs).

Table 3: Estimated volume harvested under Alternative B: Estimated volume harvested under Alternative B, based on pre-harvest timber cruise. It is expected that this harvest could generate ~$700k-$900k dollars net (stumpage) for landowners (CTUIR and Allottees). Pulp is estimated in both units of weight (tons) and converted to thousand board feet (MBF) for easier comparison with sawlog volume. Pine is separated into 4 diameter sorts (6-11", 12-17", 18-24" and 24"+) as mills pay premiums for higher diameter pine logs. All other species are camp run (no diameter breakdown). DF- Douglas-fir, WL- Western Larch, PP – Ponderosa Pine, GF- grand fir.

	Net BF	Net MBF
DF/WL	1215924.80	1216
PP6-11	796406.52	796
PP12-17	1098754.61	1099
PP18-24	352109.92	352
PP24+	45017.45	45
GF/other	177658.09	178
Total Sawlog	3685871	3,685.87
	Tons	MBF*
Pulp	5256.390756	938.64
Total All	4624513	4624.51

2.3 No Action Alternative

No timber harvest would take place. Natural processes would be allowed to continue and no management actions would be taken. Current successional and disturbance processes would be maintained through insect and disease perturbations and natural or unplanned human caused fire ignitions. The network of trails and roads would be maintained in piecemeal fashion by tribal users and natural resource staff on an as needed basis without formation and implementation of a dedicated travel/access management plan. Blowdown of dead trees would continue to contribute natural barriers to access for both management and tribal first foods gathering. Fencing infrastructure will also be heavily impacted by the large density of falling snags in future years.

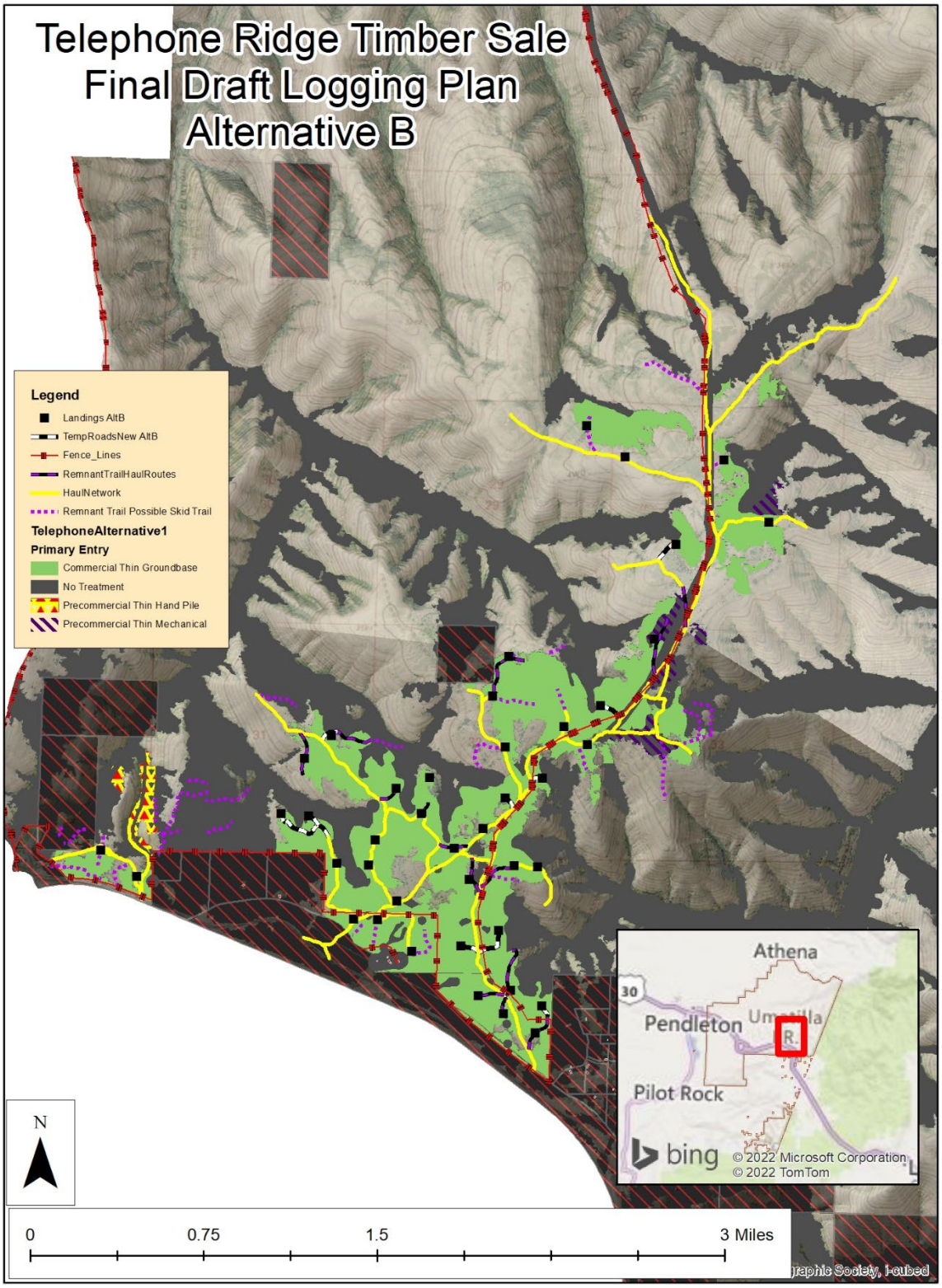

Figure 6: Draft Logging Plan for Alternative B. 754 acres of groundbase harvest and 0 acres of cable-assist (tether) harvest would occur. A smaller road network would be required than alternative A. In total, maintaining ~10 miles of existing roads, reopening ~1 miles of derelict trails, and addition of ~1 mile of new temporary spur roads are required under alternative B.

3. Affected Environment

This section profiles the environmental resources In the Telephone Ridge Timber Sale Area. The resources include the relevant physical, biological, social and economic conditions that would change under the implementation of an alternative or that might aid in understanding the alternatives. Some of these topics have been described in previous sections.

3.1 Land resources

The terrain is highly variable, with slopes ranging from 0 to 120%. Elevation ranges from 3,200 to 3,800 feet. The area includes all aspects, but generally the ground base stands are flat with minimal aspect and less than 20% slope which then fall into steep headwater canyons with a predominantly north component. Soils in flat forested stands are primarily Tolo-Klicker associations (36% of total planning area), or Klicker-Anatone-Bocker complex (8%). Albee-Bocker-Anatone complex soils (8%) and Waha-Rockly complex soil types (20%) predominate in flat scab flats areas on the perimeter of forested stands and on steep south facing aspects that are not forested. The predominate soil types in steep forested stands proposed for management are Umatilla-Kahler-Gwin association types soils (19% of planning area). See Supplemental Figure S2 for Soil Map.

The soil types in the area are moderately suited to heavy equipment operation, with steep soil types rated poorly due to slope. Nearly all soils are severely susceptible to rutting and road and trail erosion, and moderately suited to natural surface roads. The main limitations for timber management are the hazards of compaction and erosion, steepness of slopes, the high content of rock fragments in the Klicker soil, and plant competition. Using standard wheeled and tracked equipment when the soil is moist causes rutting and compaction. Puddling can occur when the soil is wet. Displacement of the surface layer can occur on the Tolo soil when it is dry. This soil base makes poor subgrade for roads because it does not compact easily when dry, has high potential for frost action, and has high available water capacity. When wet or moist, unsurfaced roads and skid trails are soft and slippery. They may be impassable during rainy periods. Steep skid trails are subject to rilling and gullying unless they are provided with adequate water bars or are protected by plant cover, or both.

3.2 Water resources

The project area occurs in 3 sub-watersheds. A small portion of the southernmost extent of the planning area drains south under I-84 and into the Upper North Fork McKay Creek sub-watershed of McKay Creek. The remaining planning area is bisected by the main transportation route (Telephone Ridge Road) into portions that drain west into Buckaroo Creek and to the East into Isqúulktpe creek, respectively. Both of these subwatersheds are part of the Umatilla River watershed. There are 4 previously identified spring locations within the planning area, but likely more that have not been adequately identified.

Small ephemeral and intermittent tributaries are present throughout much of the sale area, primarily in the canyon bottoms below steep stands proposed for management (Supplemental Figure S1). North Fork McKay Creek flows into McKay Creek which fills McKay reservoir before meeting the Umatilla River near Pendleton, OR.

Isqúulktpe creek and Buckaroo Creek flow north before joining the main stem of the Umatilla River near Thorn Hollow, OR (Supplemental Figure S2). In total there are approximately 20.0 miles of unnamed zero order ephemeral channels, 2.9 miles of Strahler first order streams, and 5.4 miles of Strahler second order streams that overlap or bound stands identified for management.

Table 4: Water resources associated with the Telephone Ridge Timber Sale.

Sale	Watershed	Subwatershed	Tributaries present
Telephone Ridge	McKay Creek	Upper North Fork McKay Creek	Unnamed tributaries of North Fork McKay Creek.
Telephone Ridge	Umatilla River	Buckaroo Creek	Buckaroo Creek; Unnamed tributaries of Buckaroo Creek
Telephone Ridge	Umatilla River	Isqúulktpe Creek	Unnamed tributaries of Isqúulktpe Creek

The Oregon Department of Environmental Quality lists North Fork McKay Creek as water quality limited under Section 303(d) of the Clean Water Act of 1973 (33 Statute 1251), due to increased rates of sedimentation, temperature, and modifications to stream habitat.[7] Buckaroo and Isqúulktpe Creeks are temperature limited under CTUIRs TMDL (2005).

3.3 Air

The UIR is in a Class II Area in attainment with the National Air Ambient Quality Standards. There are no major point sources of air emissions regulated under Title III, Title IV, or Title V of the Clean Air Act. Area air emission sources include fugitive dust, stationary sources too small or numerous to account for individually, residential wood burning, and forest and agricultural prescribed fires.

3.4 Living resources

3.4.1 Vegetation

Both dry pine dominant and moist mixed conifer forest types are present in the project area, but are primarily in the warm/dry plant association groups. Plant associations vary considerably across aspects and soil types, and microsites are scattered throughout the area based on minor drainage features. But the predominant plant associations found in the project area are: ponderosa pine/common snowberry (PIPO/SYAL), Douglas-fir/common snowberry (PSME/SYAL), Douglas-fir/mallow ninebark (PSME/PHMA), ponderosa pine/Douglas-, Douglas-fir/Creambrush Oceanspray (PSME/HODI), A number of grand-fir plant associations were determined in pre-existing inventories, but generally are grand-fir/twinflower (ABGR/LIBO2) or grand fir/Douglas' spirea.
A full list of stands investigated in this planning area, their current density (in terms of quadratic mean diameter and basal area) and the target basal area for this stand type is provided in supplemental table ST1. Overall, nearly

7 *The Agency's approval of the State's 2022 303(d) list does not apply to any waters, or portions thereof, that are within Indian country. EPA is taking no action to approve or disapprove the State's list with respect to any waters within Indian country.*

every stand in this planning area contained 2-3 times the standing density (in terms of basal area) than would be recommended for management of ponderosa pine at their respective sites.

Forest Health

The most concerning forest health threat in this compartment is bark beetles which are causing ponderosa pine mortality in large pockets throughout the North Fork McKay Compartment. These pockets have been apparent by aerial detection, stand exam, and are conspicuous from I-84 and have been steadily growing for 5+ years. Today there are many patches (between 5-20 acres) of stands nearly completely dead from bark beetles. There is evidence of western pine beetle (*Dendroctonus brevicomis*), mountain pine beetle (*Dendroctonus ponderosae*), pine engraver (*Ips pini*), and red turpentine beetle *(Dendroctonus valens*) in trees throughout the area, sometimes with multiple beetles in the same tree. However, western pine beetle and pine engraver seem to be the primary insect agents causing widescale mortality. It is believed that several drier and hotter than average summers together with overstocked pine stands has contributed to the bark beetle outbreaks in this area. The worst effected stands are around the edges of pine dominated stands.

In mixed conifer stands, particularly in the more moist east and north facing slopes, favorable habitat for root rot fungal pathogens is found in this area, affecting primarily Douglas-fir and grand fir. Douglas-fir dwarf mistletoe (*Arceuthobium douglasii)* plagues Douglas-fir trees throughout the project units, particularly in the steep slopes on the eastern portion of the sale area. In many pockets, nearly every mature Douglas-fir tree is moderately to severely infected with mistletoe. Western larch trees are also heavily impacted by larch dwarf mistletoe (*Arceuthobium laricis*) throughout the project area.

Data presented in Supplemental Table ST1 was based on stand exams collected in the years prior to this expansion in bark beetle activity. So, these estimates assume relatively moderate levels of baseline mortality and would predict higher live tree basal area than would be evident today. Because in the last several years stand conditions have quickly degraded, it was important in this project to determine what proportion of the trees in these stands recently died and are in imminent risk of future mortality. These estimates were provided as a result of the cut-volume cruise that occurred following marking of these stands (See Silvicultural Method Section, below). Many of the stand types revealed between 10-20% of the basal area had died in recent years. It is expected continued drought and insect/disease pressure will further contribute to high levels of mortality in coming years.

First Food Plants

Culturally important plants observed within the project area include sawítk (Indian carrot; *Perideridia gairdneri*) and Coush (*Lomatium cous*). These culturally important plants are located within project areas and diffuse assemblages of first foods roots occur in openings and along ridges. Indian carrot grows in dry or wet meadows, open woodlands and along fringes of forest stands. Coush tends to grow on scab flats at the edge of forested stands. One significant patch of huckleberry approximately 4 acres in size (*Vaccinium membranaceum*) was identified but is otherwise absent in the planning area. Huckleberry typically occurs and is most productive at higher elevations (4500'-5500' elevation ASL) in the Blue Mountains. *Hóopop* (Black tree lichen; *Bryoria fremontii),* is an edible lichen species that grows abundantly in coniferous forests of the Blue mountains and was a valuable traditional food. It is most associated with mature ponderosa pine trees.

Noxious weeds
Sulfur cinquefoil (*Potentilla recta*) has been identified extensively along the main access road (Telephone Ridge Road) through the project area, mainly on the scabby rangeland adjacent to the road on the ridge tops.

Common St.Johnswort (*Hypericum perforatum*), Bull thistle (*Cirsium vulgare*), scotch thistle (*Onopordum acanthium*), Canada thistle (*Cirsium arvense*), common mullein (*Verbascum thapsus*) and common hound's tongue (*Cynoglossum officinale*) are noxious weeds that have been noted along or in the vicinity of the project area.

3.4.2 Wildlife and Fish

The project area is summer and winter range for mule deer (*Odocoileus hemionus*), white-tailed deer (*Odocoileus virginianus*), and Rocky Mountain elk (*Cervus canadensis*) (Supplemental Figure S3). Areas with relatively gentle topography are potentially deer fawning and elk calving areas because of cover, abundant spring forage and water availability. Actual numbers of animals using the project area are unknown. Summer visual surveys indicated low summer use by elk, with some deer activity in the riparian and ridgetop areas. Cattle are grazed on portions of the project area during summer, which may displace the elk (Coe *et al*. 2001). Feral horses are evident in portions of the planning area and in nearby canyons and plateaus.

Section 7 of the Endangered Species Act (ESA; 16 U.S.C. 1531 et seq.) of 1973 as amended, and its implementing regulations found at 50 CFR 402, require federal agencies to ensure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat.

One small reach of Buckaroo Creek in the Southwest most corner of the project area is immediately adjacent to area considered critical habitat for Mid-Columbia Steelhead trout (See Supplemental Figures S1 and S2). Critical habitat occurs in the main reaches of Buckaroo Creek and Isqúulktpe Creek as they drain toward the Umatilla River. The entire Umatilla River basin is considered essential fish habitat for Coho and Chinook salmon, although their potential range is limited to the Umatilla River and lower reaches of Buckaroo Creek, Isqúulktpe Creek and Meacham Creek near their confluence of the Umatilla River. They are also considered extirpated from this basin. Bull Trout similarly have habitat ranges in these larger tributaries and stream reaches of the Umatilla Basin (See Figure S2). Potential impacts to federally listed fish species are addressed in a separate Biological Assessment for the project. No other threatened or endangered wildlife species occur in the project area.

Wildlife species of concern dependent on forest habitat types that may inhabit the UIR include the northern goshawk (*Accipiter gentilis*), northern pygmy owl (*Glaucidoium gnoma*), flammulated owl (*Otus flammeolus*), great gray owl (*Strix nebulosa*), olive-sided flycatcher (*Contopus borealis*), pileated woodpecker (*Dryocopus pileatus*), American three-toed woodpecker (*Picoides dorsalis*), and black-backed woodpecker (*Picoides articus*). The white-headed woodpecker (*Picoides albolarvatus*), Lewis' woodpecker (*Melanerpes lewis*), and MacGillivray's warbler (*Oporornis tolmiei*) depend on a variety of forest types and structures and may occur on the UIR. The extent to which these species use the project area is unknown.

3.5 Cultural resources

Section 106 of the National Historic Preservation Act (NHPA) as amended, and its implementing regulations found at 36 CFR Part 800, require federal agencies to identify effects to cultural resources for a federal action. The significance of the resources must be evaluated using established criteria outlined at 36 CFR 60.4. If a resource is determined to be a historic property, Section 106 of the NHPA requires that effects of the undertaking on the resource be determined. A historic property is: "…any prehistoric or historic district, site, building, structure or object included in, or eligible for inclusion in the National Register of Historic Places, including artifacts, records, and material remains related to such a property…" (NHPA, 16 USC 470w, Sec. 301[5]).

The CTUIR's Cultural Resources Protection Program (CRPP) has conducted previous archaeological surveys on portions of the proposed project area in connection with past management. Approximately 419 acres of the proposed project area had been surveyed for cultural resources in the last 10 years. Locations of previously identified sites with protective buffers were provided to CTUIR forestry staff and the site buffers were excluded from initial layout and avoidance was developed into draft logging plans. Approximately 1,721 acres of the project area were surveyed in 2022 and a report of the findings for the planning area is in development and will be complete prior to final approval of the project for advertisement and implementation. Additional cultural sites and mitigation measures will be incorporated into final logging plans at that time in consultation with CTUIR CRPP staff and the THPO.

3.6 Socioeconomic conditions

The CTUIR no longer rely on natural resources for their main source of income. However, forest products still represent economic value to the CTUIR and especially to individual Indian landowners. The loss of revenue caused by recent bark beetle mortality is extensive for several Allottees within this compartment. Ponderosa pine particularly loses structural integrity and value soon after it dies due to the blue-stain fungus carried by bark beetles and other insects. Blue-stained sawlogs sell for a fraction of the value of non-stained sawlogs, and often must be merchandized as pulp wood (essentially at zero value to the landowner) due to lack of local market for blue-stained products and concern of inconsistent structural integrity for lumber.

Lumber markets have fluctuated wildly in the years prior to the development of this project. Markets were relatively consistent for much of the 2010s. During the peak years of the COVID 19 outbreak (2020-2022), lumber prices spiked at more than double the previous market rates during spring months, with precipitous falls for periods of the late summer. Ponderosa pine has remained somewhat elevated compared to pre-pandemic prices, but Douglas-fir and other species have dropped back to near pre-pandemic rates. It is not clear if another spike is imminent for the spring of 2023 when this project could be advertised for sale.

Delivered log prices (prices that mills pay for logs upon delivery) are correlated with lumber prices, but are far more conservative during periods of high lumber prices and highly sensitive to falls in lumber prices. In past timber sales, CTUIR has adjusted stumpage rates based on rolling 12-month averages of lumber prices. This worked in CTUIRs favor because extremely high lumber prices brought the adjusted stumpage rates up considerably, even when delivered log prices offered by mills were much less elevated. However, an adjusted

stumpage rate for this project will have to be more stable in order to garner interest from potential bidders concerned about getting locked into highly escalated price adjustments during periods of high volatility.

The market for UIR timber is defined as Baker, Grant, Morrow, Umatilla, Union, Wallowa and Wheeler counties in northeastern Oregon and Asotin, Columbia, Garfield and Walla Walla counties in southeastern Washington. At market peak, buyers from as far as western Oregon showed interest in CTUIR timber sales. However, with the depressed market the list of potential buyers has shrunk to the local region. The high bonding requirements and up-front costs of purchasing BIA timber sales of this size generally eliminates smaller firms (such as logging contractors) from bidding.

In 2018, Boise Cascade sold three of their local mills (Pilot Rock, La Grande, and Island City) to Woodgrain Co., an international finished wood products company headquartered in Idaho that specializes in pine products. The Elgin mill was retained by Boise Cascade and specializes in Douglas-fir and larch, mainly for veneer. Boise Cascade has been the log buyer on recent CTUIR sales and remains the likeliest log buyer for future timber sales. Woodgrain has not actively bid on CTUIR timber sales, but was the recipient of pine sawlogs on past sales with delivery negotiated by Boise Cascade. Given the high proportion of ponderosa pine in this timber sale, Woodgrain may be interested in being the outright purchaser. Idaho Forest Group and Bennet Lumber in Lewiston, ID/Clarkston, WA are also positioned to be potential buyers even in down market years.

3.7 Resource use patterns

The CTUIR exercise their treaty rights through activities such as hunting, fishing, and the gathering and use of First Foods and other natural materials. Tribal members utilize cultural plants for food, ceremonies, fiber, fuel, and medicine. Hunting and fishing, root and berry gathering, and firewood collection is widespread throughout forested areas on the UIR and across the ceded territory.

Many of the parcels in the most accessible portions of Telephone Ridge are allotments, and there are issues with collection of firewood or other forest resources by non-allotment owners, even when performed by enrolled CTUIR members. Access and collection could be pursued as a form of trespass. Given the high amount of fractionation of allotment interests, allotment access by tribal members is not tightly regulated. This network of trails and forest roads are not public roads and are off-limits to the general public. Unauthorized access by non-Indians on tribal lands (regardless of land ownership type) is a major concern, but enforcement is challenging. Increases in unregulated forms of access related to public trespass, off-season hunting, shed collection, and off-road vehicle use and the pressure this places on big game wildlife and other resource values are considered an unfortunate consequence of reestablishing trails for active forest management.

Road surfaces within the project area are unimproved. Deep ruts are common during wet conditions allowing use only by vehicles with high clearance. These low standard roads provide operational access for land management and allotment owner/tribal user access for cultural, subsistence, and recreational purposes, but precludes access during portions of wet season or by low clearance vehicles. The high amount of fallen logs and poor driving conditions along roadways has served to further constrain access in recent years. Forest users often establish new trails to avoid puddles and fallen trees, creating additional impacts along the unmaintained road network. Because the entirety of the road network in the planning area are non-system native surface forest roads and trails, they do not receive formal maintenance or dedicated access management.

3.8 Visual resources

Allotment owners and other tribal members who frequent this planning area have grown accustomed to dense stand conditions but have been increasingly alarmed by the scale and rate of recent mortality and consider this visually unappealing. Some tribal elders familiar with the area reflect on the more open park-like stand condition in the area that they recall from their youth. Despite high amounts of dead, dying, and defective trees in these stands, there still remain a significant amount of very large old ponderosa pine trees that will be retained and revealed as a result of this thinning project. Maintaining pockets of healthy trees of other size classes interspersed between very large old ponderosa pine trees is widely considered visually appealing and aligns with restoration focused management of dry pine environments[8].

Much of the lands within this project area are not visible from the public interstate. Most of the immediately visible lands from public roads are in state or private ownership, properties that will be unchanged in this project. Thus, the casual public is unlikely to recognize the extent of work being completed in this project. Much of the local landowners who hold land within the reservation within or adjacent to the treatment areas generally support these proposed activities as they perceive a lack of active forest management on Tribal land has directly increased insect and disease problems on their properties. They also are concerned over the risk of catastrophic wildfire spread near their properties. Most land owners who have provided feedback approve of the style of commercial thinning implemented in recent CTUIR timber sale projects and the visual aesthetics it maintains. A majority share (by title interest) of landowners for all allotments within proposed treatments have consented to the proposed treatments in the form of a Power of Attorney for Sale of Allotment Timber (BIA Form 5-5315).

[8] See For example: Churchill, D. J., Carnwath, G. C., Larson, A. J., & Jeronimo, S. A. (2017). Historical forest structure, composition, and spatial pattern in dry conifer forests of the western Blue Mountains, Oregon. *Gen. Tech. Rep. PNW-GTR-956. Portland, OR: US Department of Agriculture, Forest Service, Pacific Northwest Research Station. 93 p.*, *956*.

4. Environmental Consequences

This section discloses the potential effects of the alternatives described in Section 2 and is intended to provide an analytical basis for comparison of alternatives (Table 4). The analysis of environmental consequences assumes that all management requirements and constraints will be carried out.

Table 5: Summary of expected effects of implementation of alternatives for the Telephone Ridge Timber Sale.

Affected Environment	No Action Alternative	Alternative A	Alternative B
Land Resources			
Potential for soil compaction	No change over present conditions	Low; harvest will occur on dry soil, disturbance greatest in landings and skid trails	Low; harvest will occur on dry soil, disturbance greatest in landings and skid trails
Potential for increases in soil erosion	No change over present conditions	Medium; potential for short term erosion increase especially in steep stands	Low; potential for short term erosion increase
Water Resources			
Impact on stream sedimentation	No change over present conditions	Medium; chance of short-term sediment increase, especially downslope of treated steep stands	Low; chance of short-term sediment increase
Road impacts on stream sedimentation	No change over present conditions	No Change over present conditions, most roads are far upslope of streams	No Change over present conditions, most roads are far upslope of streams
Potential for increases in water yield	No change over present conditions	Potential for slight peak flow increase for 1-2 yrs. Lower canopy cover could retain higher snow pack into spring.	Potential for slight peak flow increase for 1-2 yrs. Lower canopy cover could retain higher snow pack into spring.
Impact on stream temperature	No change over present conditions	No change over present conditions	No change over present conditions
Air			
Impact on air quality	No change over present conditions	Low; minor, temporary increase in air pollutants	Low; minor, temporary increase in air pollutants
Living Resources			
Vegetation			
Promote forest tree health and long-term sustainability	Low; no density control	High; stands stocked between upper and lower management zones	Medium-High; stands stocked between upper and lower management zones except those not treated due to steep slope/access
Increases in understory productivity, including huckleberry and other traditional plants	Low; tree canopy cover too dense	Medium; long-term increases expected with canopy cover reductions, although temporary reductions may occur if impacted by equipment operation;	Medium; long-term increases expected with canopy cover reductions, no change in untreated stands; Decrease in tree lichen abundance.

		Decrease in tree lichen abundance.	
Increases in noxious weed populations	No change over present conditions	Moderate; increase with soil disturbance	Moderate; increase with soil disturbance
Wildlife			
Reductions in big game use	No change over present conditions	Low; temporary reductions likely	Low; temporary reductions likely
Reductions in big game hiding cover	No change over present conditions	Low; adequate cover should remain	Low; adequate cover should remain
Number of snags and downed wood	No change over present conditions, generally very high	Moderate; standing snag quantities reduced to recommended levels. Downed wood increased unless consumed in broadcast fire.	Moderate; standing snag quantities reduced to recommended levels. Downed wood increased unless consumed in broadcast fire.
Fish			
Impact to fish populations	No change over present conditions	No change over present conditions	No change over present conditions
Cultural Resources			
Impacts to known archaeological sites	No change over present conditions	Low; archaeological sites will be marked and protected or mitigated for. Improved road conditions could increase use which may have indirect effects to archaeological sites.	Low; archaeological sites will be marked and protected or mitigated for. Improved road conditions could increase use which may have indirect effects to archaeological sites.
Socioeconomic Conditions			
Risk of lost economic return by delaying establishment of productive stands	High	Low	Low
Volume and stumpage value harvested	None	6 MMBF ~$1.2M	3.7MMBF ~$800k
Resource Use Patterns			
Road access for traditional uses	No change over present conditions	Low; temporary increases in logging traffic, improved access on reopened trails not otherwise closed	Low; temporary increases in logging traffic, improved access on reopened trails not otherwise closed
Road condition for traditional uses	Low; current condition poor in places, fallen trees and overgrown shoulders blocks access	Moderate; improved with maintenance	Moderate; improved with maintenance
Visual Resources			
Maintenance of healthy viable trees	Low; mortality likely to continue at accelerated levels	High; retention of most healthy trees at recommended stocking levels	Medium-High; retention of most healthy trees at recommended stocking levels, except where stands not treated and insect/disease issues exist

Impact to visual quality during harvest	Low; visual resources somewhat degraded due to natural mortality	Moderate; harvest activities may be perceived as an impact to visual quality	Low-Moderate; harvest activities may be perceived as an impact to visual quality. Not harvesting steeper slopes may reduce visual quality impacts.
Impact to visual quality after harvest	Medium; visual resources degraded due to excess mortality	Low; acres fully stocked and vegetation regrows in affected trails.	Low; acres fully stocked and vegetation regrows in affected trails.

4.1 Land resources

Alternative A

Timber harvest equipment could increase soil compaction and soil displacement within forest stands regardless of soil moisture conditions and standards implemented to minimize impacts. Soil compaction effects include an increase in bulk density, a decrease in surface infiltration capacity and an increase in resistance to root penetration. Spur roads, skid trails and landings will be the primary areas impacted. Extensive use of unimproved roads by logging trucks could increase channeling of water flows, rutting of the soil surface, and loss of soil from the roadbed, although most roads have poor drainage and are on flat plateaus with limited potential for runoff directly into streams.

Compared to standard yarder equipment, road standards and location for use of tether-assist are far more flexible as roads do not need to be repositioned to ensure proper position for optimal deflection; often cable assist equipment can swing loads to existing trails on the ridge without additional road building or only requiring minimum-standard native surface grades/skid trails for access.

It is estimated that up to 13.2 miles of existing trails would have to be maintained and 2.3 of derelict remnant trails would have to be restored in order to facilitate equipment access. Additionally, 2.8 miles of native surface spur trails would be required for hauling. These new trails are mainly needed to access the upslope of steep stands. Past harvest entries on steep stands in the 1950's generally used roads and trails built within the floodplain of creek drainages, trails that will not be reopened in this project and will continue to be derelict due to water quality concerns in reestablishing road/trails near floodplains.

Road maintenance (blading, limited spot rocking) on existing haul roads is proposed as part of the timber sale contract. Maintenance will occur at the initiation of commercial thinning within an area, and will be required periodically throughout hauling to protect against excessive rutting. Also proposed is reestablishment of some relic trails for hauling and skidding.

Any relic trails or new native surface trails or major skid trails established in connection with this sale will be blocked with cull logs or other natural barriers, water barred, and reseeded with native grass/forb mix following treatment. More aggressive forms of reclamation such as ripping and recontouring is not proposed, but could be approached as a stand-alone project following completion of all activities associated with this project as a further approach to regulate future travel and access in this area.

Other formal access management approaches including significant barriers/gates at project area entry points, regulated seasonal closures, and regular patrol by law enforcement personnel could all serve to protect resource values from inappropriate use. A dedicated planning effort to determine access management in this and other forested areas of the reservation is needed to better inform long-term management of forest road infrastructure following timber management.

Alternative B

Same effects as in Alternative A, but on a reduced footprint. Road networks would be reduced and soil disturbance would not occur in stands requiring cable-assist logging in Alternative A, these steep areas are the most likely to have short-term increases in erosion due to slope, mitigating the potential for sediment to reach streams. A smaller road network is needed: 10 miles of existing road, 1 mile of remnant trails reopened, and 1 mile of new trails. Landing impact along the upslope of steep stands will be non-existent.

No action alternative

The No Action Alternative will result in no changes to existing soil conditions. The current high level of vegetative ground cover reduces the potential for soil erosion within forest stands. Unimproved roads will continue to experience soil loss due to improper construction.

4.2 Water resources

Alternative A

Timber harvest equipment will increase the risk of sedimentation, turbidity, and potential for mobile sediment inputs in-stream with potential impacts to water quality for a short period of time. However, given the natural stability of this area due to the relatively flat topography on ridges, the relative light removal of trees, and the no-harvest buffers along all riparian areas (see S2 Standard, Appendix A), significant effects on water quality, sedimentation and turbidity is unlikely. Increases in water temperatures are not expected due to the riparian area buffers.

Areas with greatest concern for water quality impacts are below steep stands designated for tethered logging. These systems have the ability to reposition slash on skid trails and introduce some weave on trails, preventing sheet flow of water in rain events. Broken tops and limbs also help to buffer erosion. It is assumed that these practices together with RMZ buffers implemented in line with CTUIR Forest Management Plan standards are sufficient to protect water quality in all streams below tethered logging units.

Within two years after the completion of harvest, naturally occurring shrubs, grasses, and forbs as well as any rehabilitation seeding of landings and spur roads should increase ground cover, resulting in enhanced infiltration and reduced overland flow and potential erosion hazard. Major areas of ground disturbance such as along road banks, landings, and major skid trail will be reseeded with a native forb/grass mix to expedite recovery of ground cover.

Alternative B

Timber harvest equipment will increase the risk of sedimentation, turbidity, and stream channel stability for a short period of time, as in Alternative A. However, because most of the steep ground adjacent within stream draws will be excluded in this alternative, the disturbance near stream courses will be reduced and there will be less potential impact to water resources.

No action alternative

The No Action Alternative would result in no immediate change to existing water quality, quantity, and flow characteristics. Currently there is a high level of ground cover lessening the potential for erosion of bare soil. The timber stands reduce direct radiation from the sun extending the period of snow melt and reducing surface water runoff. However, dense stands and dead and dying trees increase the potential for high severity wildlife, which could result in negative water quality impacts following a high intensity wildfire event.

4.3 Air

Alternative A

Timber harvest operations will result in a minor, temporary increase in common air pollutants. Logging equipment and operations will result in tailpipe emissions and fugitive dust. Road reconstruction will also likely contribute fugitive dust. Slash pile burning will result in temporary, localized increases in air pollutants. All prescribed burning will be in accordance with state and/or Tribal smoke management plans.

Alternative B

Impacts to air quality would be similar to Alternative A, but reduced proportional to the reduction in harvest area and road work.

No action alternative

The No Action Alternative would result in no immediate change to existing air quality. However, dense stands and dead and dying trees increase the potential for high severity wildlife, which could result in negative air quality impacts.

4.4 Living resources

4.4.1 Vegetation

Alternative A

Timber harvest would reduce current tree stocking rates by approximately 40-60%, depending on the unit (see Supplemental Figure S5). The proportion of ponderosa pine and western larch would increase and the proportion of Douglas-fir and grand fir would decrease. Structural stages of forest community types would be maintained within the historic range of variability (see Table 2-1, Appendix A). High stand vigor would be maintained, ultimately increasing resistance to insects and diseases.

Ground disturbance resulting from mechanized harvest equipment, skid trails, and landings will temporarily damage understory vegetation but decreases in tree canopy is expected to ultimately favor understory shrubs, grasses, and forbs. To minimize impacts to first food plants, significant patches of Coush, Indian carrot, huckleberry, or other observed cultural plants will be flagged by CTUIR forestry personnel and consulted with the

CTUIR Plant Ecologist for avoidance, minimization or mitigation. No skid trails or landings will be permitted within the flagged areas, and mechanized harvest will be limited in these areas.

Ground disturbance and decreased tree canopy cover will increase the potential for noxious weed establishment and expansion. Seeding skid trails and landings with native species, and monitoring and treating weeds after harvest is completed will reduce opportunities for weed establishment.

Alternative B

Impacts to vegetation resources would be similar to Alternative A, but reduced proportional to the reduction in harvested acres and required road work.

No action alternative

If no action is taken, tree stocking rates will continue to approach stocking limits of stand types, with periodic cycles of heavy mortality from combined impacts of, insects, disease, and drought. These impacts will likely continue to reduce stand vigor, growth rates will decline, and understory vegetation will continue to be suppressed. The risk of stand-replacing wildfire will continue to increase with high tree densities, increasing composition of shade-tolerant tree species, and increasing fuel loads.

4.4.2 Wildlife and Fish

Alternative A

Timber harvest activities could temporarily increase disturbance to big game due to added road traffic and equipment operation within stands. However, upon conclusion of harvest, animals should quickly return to the area. While hiding cover for big game may be temporarily reduced, foraging habitat should be improved and or/increased. Hiding cover will be maintained in unharvested areas, patches of small, non-commercial trees retained through harvest, as well as in riparian buffers. Due to the possibility of big game animals calving in the project area, no mechanized operations are planned between early May and late June without consultation with CTUIR Wildlife Biologists to ensure elk calving is not disturbed. Forage quality and quantity is expected to increase in the long-term as understory vegetation responds to reductions in tree canopy cover and follow-up prescribed fire.

Habitat conditions for wildlife species dependent on snag and logs will be maintained. Snag levels will be provided that are in the historic range of variability (Appendix A), adequate numbers of large green trees will be retained to ensure future snag and log habitat, and recommended levels of large down woody material will be maintained (Appendix A) or increased. Reductions in tree stocking rates will allow faster development of large diameter trees, which will provide long-term benefits to many wildlife species.

One small section of potentially critical habitat for Mid-Columbia Steelhead is adjacent to a treated stand. This stand can be omitted from mechanical treatment, or RMZ buffers extended if determined this would mitigate potential negative impacts to this species. However, this stand is immediately adjacent to a public interstate rest area and transportation corridor. It has high value for treatment to reduce wildfire transmission risk to this public

infrastructure, particularly because all stands down stream of this stand will not be treated and therefore have potential to transmit a crown fire.

All other stands treated are not immediately adjacent to fish bearing streams, and fish distribution of Coho Salmon, Chinook salmon, and Bull Trout are far downstream and downslope of areas treated in this project. RMZ standards were instated and evaluated in an Environmental Analysis prepared for the CTUIR Forest Management Plan, and were determined to be adequate to mitigate impacts to aquatic species, even when treatments were adjacent to fish bearing streams. Therefore impacts to fish are expected to be minimal given these RMZ standards. Since there are no other threatened or endangered fish or wildlife species occurring in the action area, the project will have No Effect to any federally-listed species.

Alternative B

Impacts to fish and wildlife resources would be similar to Alternative A, but reduced due to complete elimination of steep topography from consideration for treatment. On flat acreage, impact reductions will be roughly proportional to the reduction in harvested acres and required road work. Additional high-density stands would remain untreated, which may continue to provide hiding cover for big game rather than provide new foraging opportunities. Stand adjacent to critical Mid-Columbia Steelhead habitat will not be treated with mechanical thinning, but may receive a hand thinning to manage fuel load in the close vicinity of the Deadman Pass Rest Area.

No action alternative

Under the No Action Alternative the amount and quality of wildlife habitat would not change in the short-term. In the long-term, habitat conditions may degrade as forest health declines. Increases in insect and disease will increase tree mortality and the risk of stand-replacing wildfire. The high amount of decadent shrubbery, dense understories, and large jack-strawed down logs currently and to be recruited in future years may create barriers to large wildlife migration through forested stands and reduction in available forage in these woodland environments.

4.5 Cultural resources

Alternative A

Timber harvest operations will create ground disturbance but are not expected to impact the majority of known archaeological resources. No timber falling, harvesting or ground disturbing activities will occur within buffers defined by the CRPP around sites recorded during the cultural resource surveys. There are recorded archaeological sites in existing roads which will need to be minimized and/or mitigated for in consultation with the BIA and the THPO. The CRPP may require a pedestrian survey and/or monitor of the newly excavated road beds to ensure no new cultural resources are exposed during road building activities. If additional cultural resources are located during project, work will cease in the area of the resource until the find can be assessed by cultural resource personnel. If ancestral remains are located, work will cease, the area will be secured, and the CRPP/THPO, BIA, and tribal law enforcement will be contacted immediately. The BIA Archeologist will be provided all documentation currently under review by the THPO. Areas of high densities of First Foods plants (such as in proposed landing sites) will be brought to the attention of CTUIR ecologist and will be consulted to determine avoidance/mitigation measures.

Alternative B

Equivalent to Alternative A.

No action alternative

The No Action Alternative will result in the archaeological resources being subject to the same ongoing environment factors (e.g. weathering, erosion, tree fall, potential for extreme wildfire, etc.).

4.6 Socioeconomic conditions

Alternative A

The opportunity and/or need to harvest trees still represents significant economic value to the CTUIR and especially individual Indian landowners. Implementing the timber sale will provide landowners with the highest returns possible after all related logging expenses are deducted. Supplying logs to a local mill will extend economic benefits to the broader local community and help ensure retention of necessary infrastructure for economically viable forest management in the future.

It is estimated that ~8MMBF will be harvested under alternative A for an estimated stumpage value of $1M-$1.5M dollars across all owners.

Alternative B

Financial returns to some landowners may be reduced for parcels excluded from harvest under Alternative B, while for other landowners there will be an increase in revenue. Given that the steep stands that require cable-based equipment are more expensive in road-building and logging costs than the ground-base stands, excluding skyline units will result in an increase in contracted stumpage value for the landowners of the ground-based stands that are included.[9]

Future management options for the landowners of steep stands will be diminished since cable-only timber sales are more expensive on a per MBF basis, and are unlikely to attract interest from log-buyers. Obtaining permission to access stands across parcels not in future management may also be an administrative barrier to treating stands not included in this project

It is estimated that ~3.7 MMBF would be harvested under Alternative B for a total stumpage value of approximately $700k-$900k across all owners.

No action alternative

If no action is taken, these stands will continue to experience damage from insects and other damaging agents. It is likely that these stands will continue to deteriorate and individual trees or clumps of trees would continue to die out over time. These conditions would result in less than optimum growth reducing long term income

[9] The CTUIR sets its timber sale stumpage rates by aggregating the appraised logging, road building, and trucking costs across the entire sale area on a per thousand board feet (MBF) basis and then deducting these costs from regional delivered log values (aka “Pond Values”). This appraised value is advertised to regional log buyers and then using a competitive bid process a final contracted stumpage rate is set with the highest bidder. Stumpage rates are then adjusted quarterly using industry timber indexes. Stumpage rates are generally not contracted on a per parcel or per stand basis for multi-parcel timber sales.

potential to the landowners. The failure to capture fading economic resources and to include provisions for long term timber production will directly affect the Tribal community.

4.7 Resource use patterns

Alternative A

Timber harvest and associated traffic have the potential to directly impact access for traditional uses such as hunting, root/berry/medicine gathering, and firewood gathering in the short term. During thinning or prescribed fire activities, access for tribal members could be restricted or constrained in the interest of public safety. Increased vehicle use on roads during management may temporarily discourage deer and elk use of the area, further impacting hunting opportunities. In the long term, improved road conditions will increase opportunities for access for tribal public but could also encourage inappropriate and unregulated uses, and place greater hunting pressure on deer/elk. Reductions in tree canopy cover are expected to improve berry and root production and increase opportunities for gathering.

Other formal access management approaches including significant barriers/gates at project area entry points, regulated seasonal closures, and regular patrol by law enforcement personnel could all serve to protect resource values from inappropriate use. A dedicated planning effort to determine access management in this and other forested areas of the reservation is needed to better inform long-term management of forest road infrastructure utilized in connection with this project, and to better assess indirect effects of forest roads to other resource values. Long-term trail reclamation and road closures could be developed as part of this effort and implemented at a later date.

Alternative B

Similar effects to the impacted resources as listed in Alternative A. Smaller road network for long-term access management.

No action alternative

The No Action Alternative would not result in any immediate changes in resource use patterns. In the long term, continued increases in tree densities and canopy cover will further reduce big game forage availability and root and berry production. Hunting and gathering opportunities may be negatively impacted by these conditions. Large quantities of down wood are likely to impact access roads and create barriers to both unauthorized access as well as appropriate tribal resource gathering in the area.

4.8 Visual resources

Alternative A

Effects of logging are most evident in the reduction or removal of vegetative cover and corresponding increase in soil exposure. Site disturbing activities associated with the proposed timber harvest which affect the visual resource include: spur road and landing construction, leave trees with orange bands, skid trails and logging slash and stumps. These activities will moderately alter the appearance of the natural landscape. Most people who directly use the range and forest lands in the area are either tribal members and/or are engaged in occupations that are related to management and use of the land and are tolerant of land management activities that are evident on the landscape.

Alternative B

The exclusion of cable-based logging is expected to reduce impacts to the visual resource relative to Alternative A. Harvests on steeper slopes can have larger visual impacts than those on flat terrain. Corridors where harvested trees are moved up steep canyon slopes would be largely absent under Alternative B.

No action alternative

The No Action Alternative would not result in any change in the present visual quality of the area over the short term. However, the present visual quality of the proposed project area is already degraded by the extensive natural mortality that is occurring. The appearance of large dead patches of timber is objectionable, and considered a waste of natural resources by many in the local community. To the extent that this alternative may result in an increased probability of large scale wildland fire in the long term, visual degradation could be significant.

5. Mitigation Measures

To reduce or eliminate negative effects on the environment, all standards and guidelines established in the FMP will be followed (Appendix A). Specific mitigation measures that will be taken to reduce both on-site and off-site impacts include:

Land Resources

- Utilize existing trails and relic logging trails to avoid new road whenever possible.
- Use low-pressure ground equipment in both flat and steep stands damages the soil less and helps to maintain productivity
- Seed road cuts and fills with a native grass/forb mix to maintain permanent plant cover and reduce erosion
- Restrict logging during periods of wet soils to avoid rutting and compaction. Require road maintenance when rutting is greater than 12" on haul routes. Logging season will generally be during periods of dry soil, May-November.
- Install water bars and/or rolling dips to all sections of haul network where drainage could be improved.
- Grade all sections of haul network following close-out of commercial thinning treatments or at end of season.
- See all areas of major disturbance (road shoulders, landings, major skid trails) with native grass/forb seed mix to expedite recovery of native ground cover and reduce invasive weed pressure.

Water quality and in-stream fisheries habitat characteristics

- No timber harvest will occur within any floodplain.
- Riparian Management Zones equal to 75 feet horizontal width times the stream order (modified Strahler) plus the floodplain will be established on each side of all streams. The intent is to maintain potential shade for the site, vegetative filters of displaced soil, wood recruitment to the floodplain and stream channels, and high quality cover for wildlife. For example along a 2nd order stream, no equipment operation will occur within 75 ft. of the floodplain, and limited equipment operation will occur within 75-150 ft. of the floodplain. Along a 1st order stream, no equipment operation will be permitted within 37.5 ft. of the floodplain, and limited equipment operation will occur within 37.5-75 ft. of the floodplain.
- The stand adjacent to Mid-Columbia Steelhead critical habitat could be excluded from treatment, or have enhanced buffer width if determined that existing RMZ buffer rules are inadequate to ensure a determination of no significant impact to listed species.
- No new roads will be built across RMZs. One new trail will be require building across an identified Strahler 0 stream. Road building will occur during periods of dry soil when no water is present in channel. Following harvest, the natural channel will be re-established to permit free flow during high-flow events. Other new trails will be located to avoid impacts to Strahler 0 streams.

Forest Composition

- The areal extent of forest community types will be maintained at approximately the historic level.
- Structural stages of forest community types will be maintained within the Historic Range of Variability.
- High stand vigor will be maintained through stocking control in order to provide for stand resistance to diseases and insects.
- Skid trails and landings will be seeded with an appropriate seed mix of native grasses and forbs and/or acceptable native cultivars.
- Large openings (2 acres or greater) created by removal of diseased or dead trees will be replanted with ponderosa pine and/or western larch seedlings from CTUIR sourced seed from appropriate elevation bands sufficient to fully restock site within 5 years.

First Foods plants

- To minimize impacts to First Food plants, no skid trails or landings will be permitted in significant patches of traditional plants including coush, big huckleberry, and Indian carrot, and mechanized harvest will be limited in these areas. Noxious weed monitoring and treatment after harvest is completed will reduce opportunities for weed establishment.

Wildlife

- Habitat conditions for wildlife species dependent on snag and logs will be maintained. Snag levels will be provided that are in the historic range of variability, prioritizing retention of largest snags and snags with unique features. Adequate numbers of green trees will be retained to ensure future snag and log habitat, and recommended levels of large down woody material will be maintained.
- Dense hiding cover for big game will maintained in unharvested skips, patches of small, non-commercial trees as well as in riparian buffers.
- Any mechanized harvest during mid-May through mid-June will be coordinated with the wildlife program prior to entry.
- Close all roads and skid trails for access through placement of cull logs or other barriers, unless otherwise desired for long-term tribal access.

Cultural/Archaeological Resources

- Known archaeological and cultural resource sites will receive treatment buffers where mechanical operation and/or prescribed fire will be excluded. Site locations and avoidance/mitigation buffers will be determined in a forthcoming CTUIR THPO report and regular consultation between CTUIR Forestry staff and CRPP staff throughout project implementation will ensure site mitigations are implemented.
- CRPP staff will be notified of road maintenance and building activities near recorded sites to determine if additional CRPP pedestrian survey/monitoring is required
- If unrecorded cultural resources are located during project, work will cease in the area of the find resource until the find can be assessed by cultural resource personnel.
- Significant/or unique patches of Coush, Indian carrot, huckleberry, or other observed cultural plants will be flagged by CTUIR forestry personnel and consulted with the CTUIR Plant Ecologist for avoidance, minimization or mitigation. No skid trails or landings will be permitted within the identified areas, and mechanized harvest will be limited in these areas.

Resource Use Patterns

- Block access to any major skid trails or roads not required for implementation of secondary treatments as soon as commercial entry is complete.
- Following all treatments designated (planting, prescribed fire) institute permanent barriers or completely decommission roads not identified as otherwise appropriate for regulated tribal member access and resource management.

Visual Resources

- Locate landings away from major access roads (Telephone Ridge Road) wherever possible.
- Use cut-tree marking along major access roads to minimize visual disturbance of retained trees with marking paint.
- Maintain patches of high understory densities adjacent to major access roads for visual skips and wildlife hiding cover.

6. Consultation and Coordination

Consultation requirements in compliance with Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act will be completed during winter of 2023. No formal consultation with the U.S. Fish and Wildlife Service or NOAA-fisheries is expected since the project will have No Effect to federally-listed species. Consultation was with the CTUIR THPO has been initiated throughout project development and will continue through implementation to comply with the National Historic Preservation Act.

Areas of concern and potential solutions from a CTUIR Department of Natural Resources Interdisciplinary (ID) Team were solicited and incorporated into Alternatives A and B. A draft Forest Officer's report has been in development and will be reviewed by the ID Team prior to final tribal and federal permitting. Tribal permits including Stream Zone Alteration Permits, Conditional Use Permit, and Forest Practices Permit will be obtained prior to project initiation. A CTUIR Board of Trustees resolution to provide owner approval and authorization to execute timber sale contract will be completed prior to project initiation. BIA Power of Attorney for Sale of Allotment Timber (BIA Form 5-5315) has been received for a majority interest of all Allotments in this project and the Superintendent of the Umatilla Agency will review and authorize sale contract for all trust lands in project area.

7. List of Contributors

The following is a list of those who contributed to the formulation and analysis of this document in the form of technical assistance, information, and/or views:

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8. References

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Appendix A: Supplemental Figures and Tables

Figure S1: Telephone Ridge Hydrology

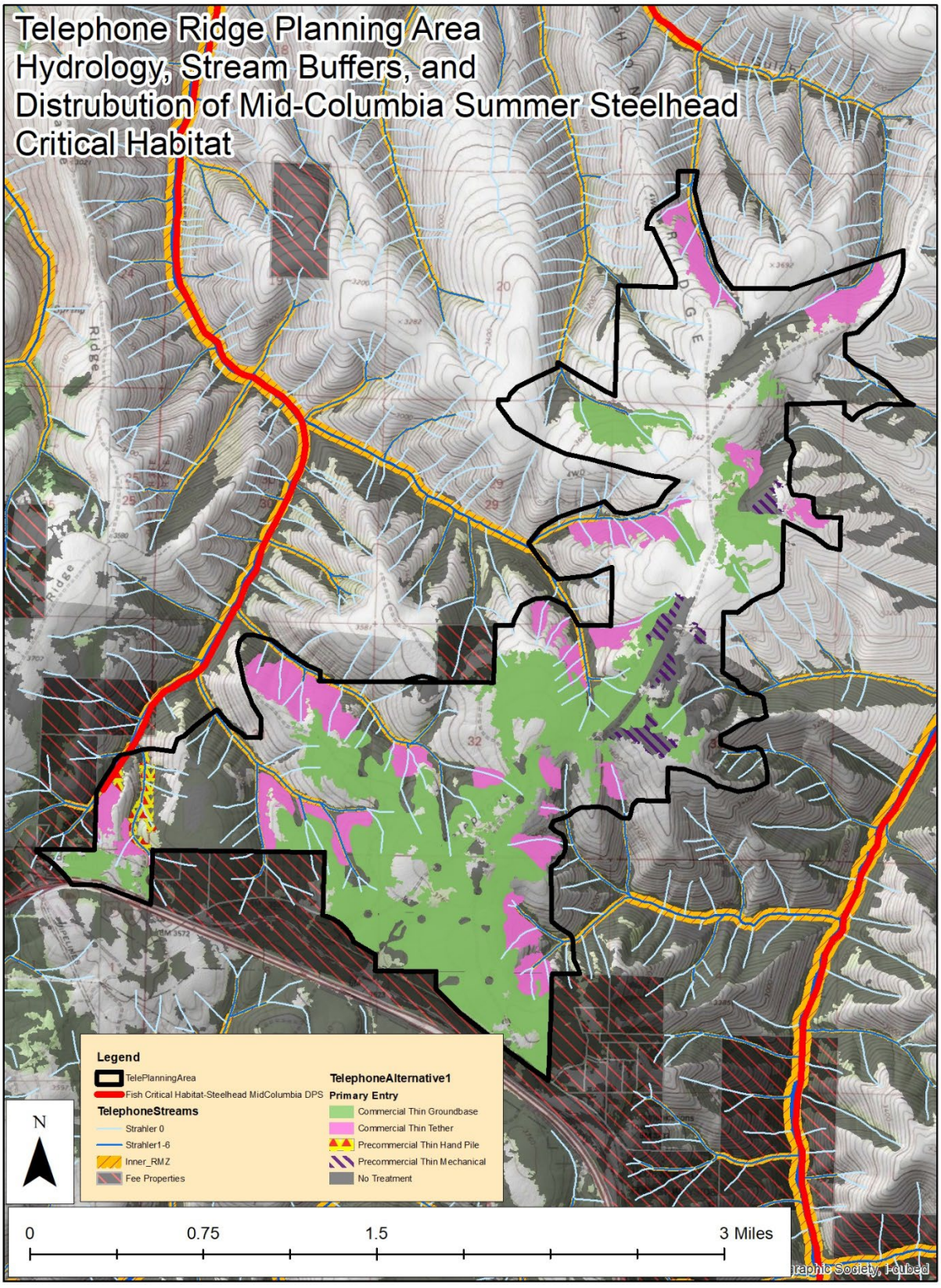


Figure S2: Telephone Ridge Threatened and Endangered Fish Habitat

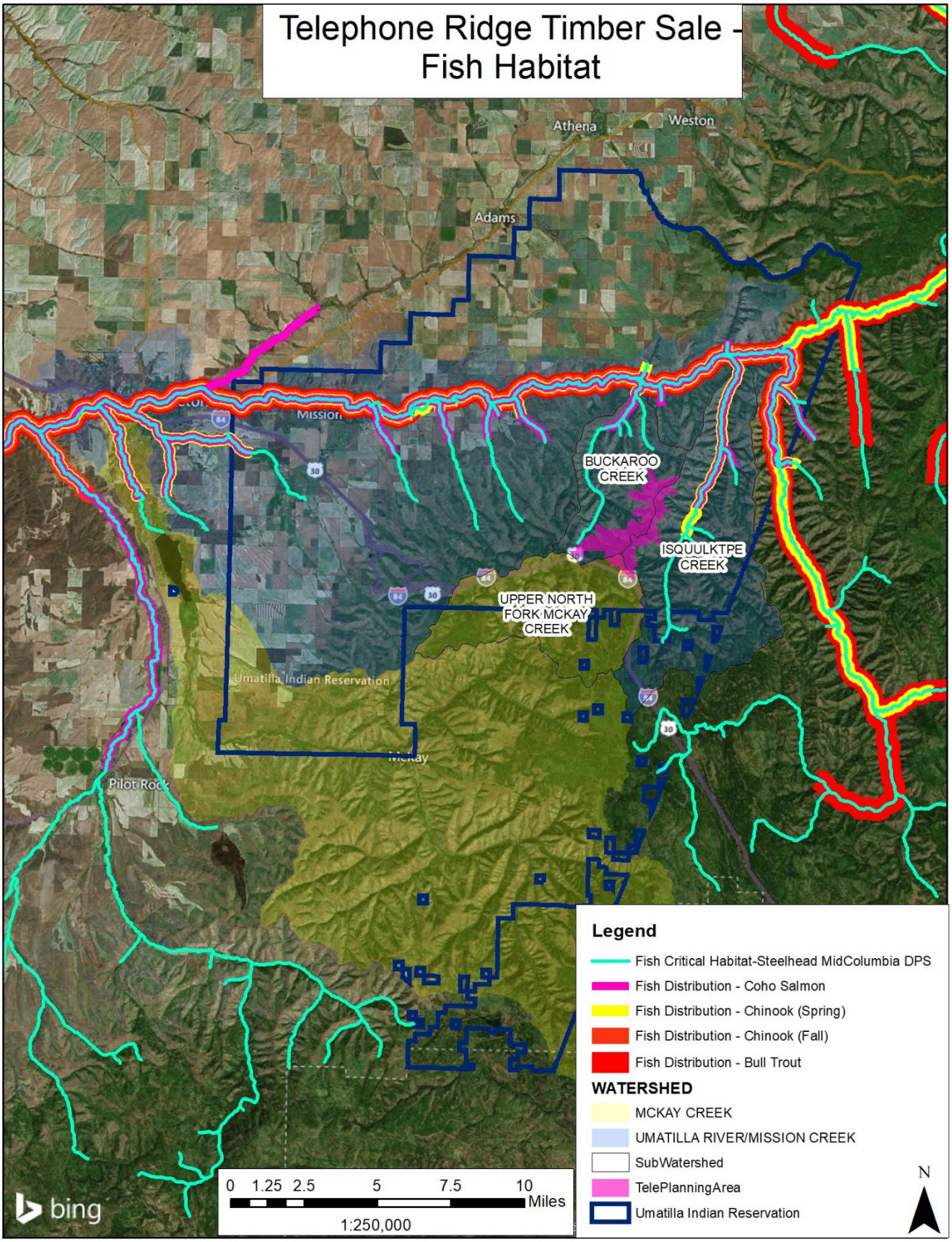
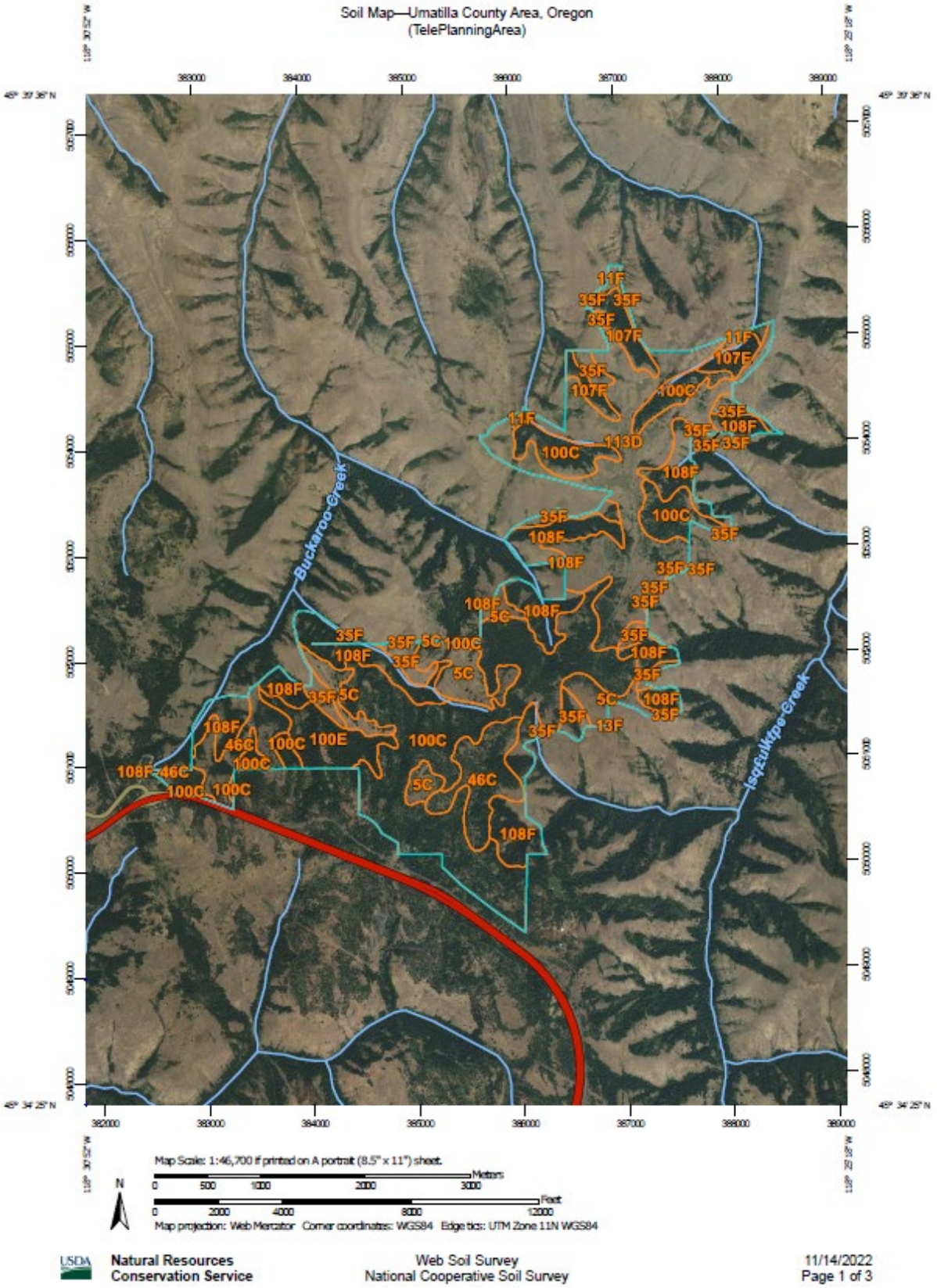


Figure S3: Telephone Ridge Soils Map



Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
5C	Albee-Bocker-Anatone complex, 2 to 15 percent slopes	208.6	7.5%
11F	Bowlus-Buckcreek association, 40 to 70 percent slopes	23.4	0.8%
13F	Buckcreek-Gwin association, 45 to 70 percent slopes	0.1	0.0%
35F	Gwin-Rock outcrop complex, 40 to 70 percent slopes	159.6	5.8%
46C	Klicker-Anatone-Bocker complex, 2 to 15 percent slopes	227.0	8.2%
100C	Tolo-Klicker association, 3 to 15 percent slopes	890.2	32.2%
100E	Tolo-Klicker association, 15 to 35 percent slopes	103.8	3.8%
107E	Umatilla-Kahler association, 15 to 35 percent slopes	28.7	1.0%
107F	Umatilla-Kahler association, 35 to 70 percent slopes	66.4	2.4%
108F	Umatilla-Kahler-Gwin association, 35 to 70 percent slopes	511.2	18.5%
113D	Waha-Rockly complex, 2 to 20 percent slopes	546.2	19.8%
Totals for Area of Interest		**2,765.3**	**100.0%**

Figure S4: Telephone Ridge Elk Range

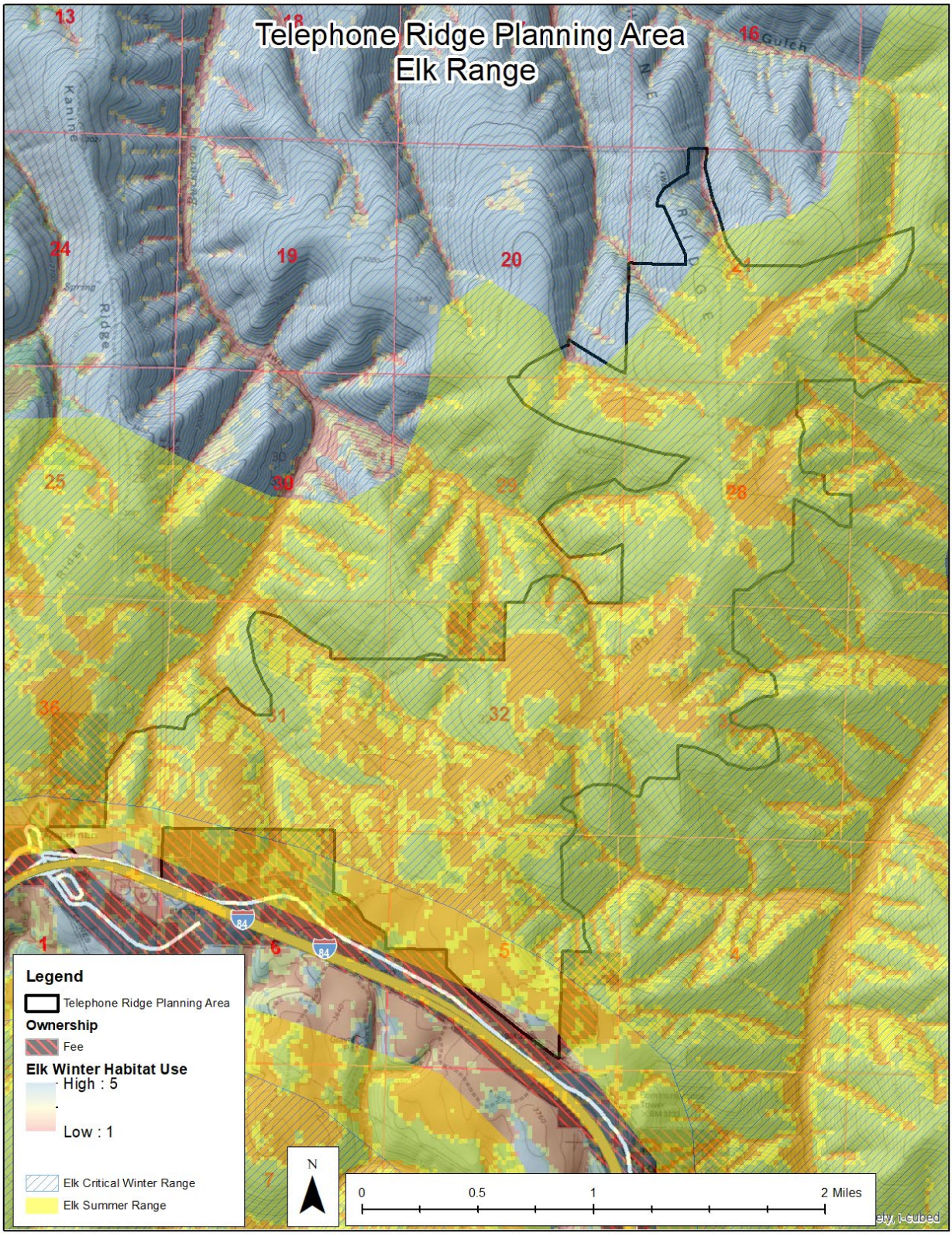


Figure S5: Telephone Ridge Cut-Volume Cruise Strata and Plot Locations

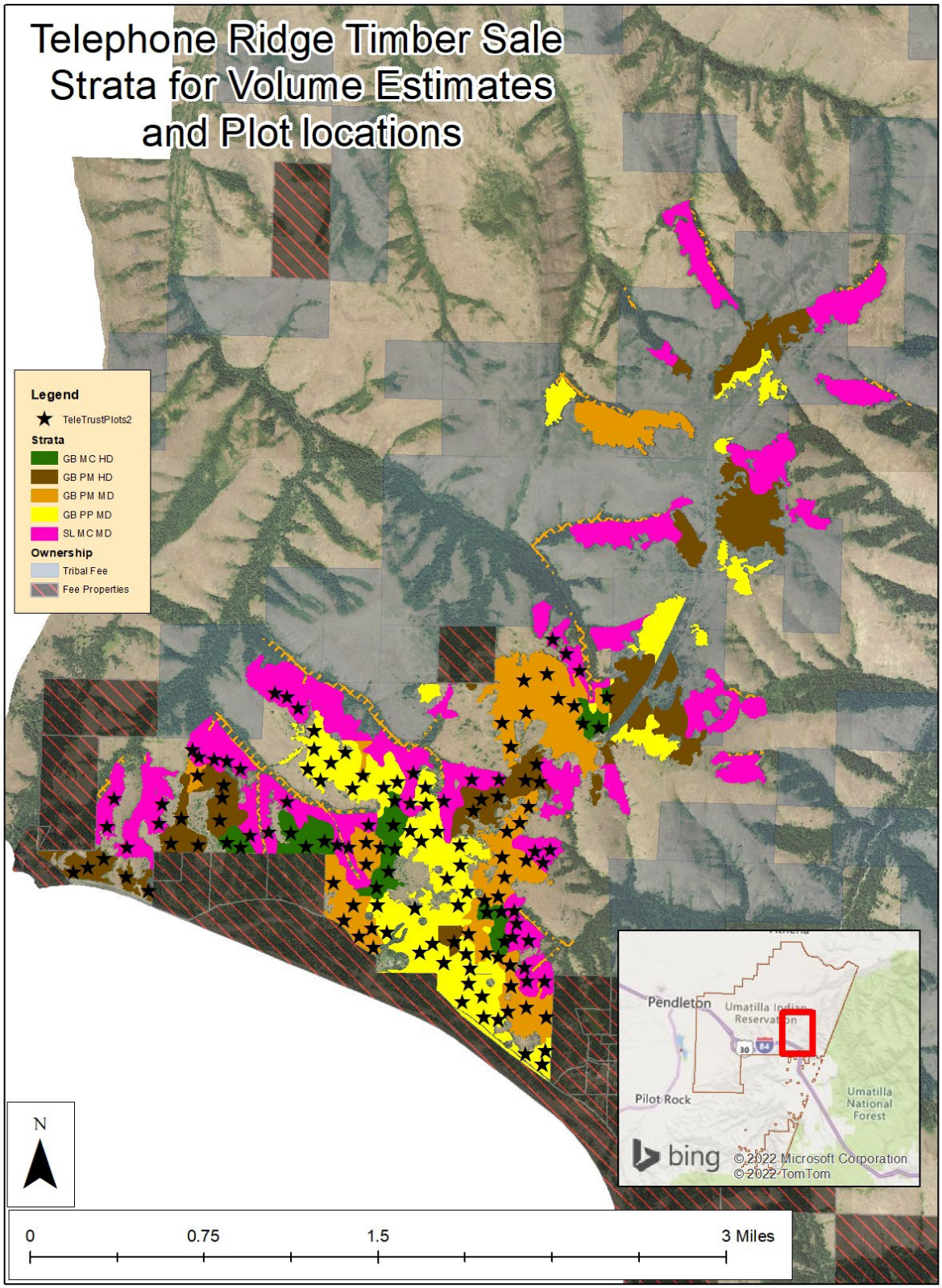
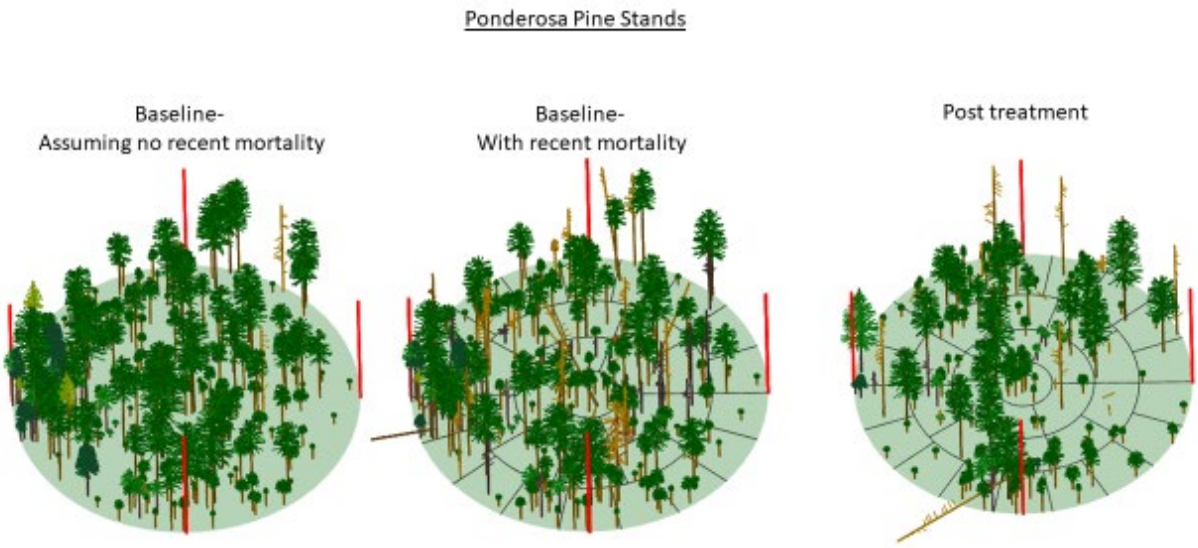
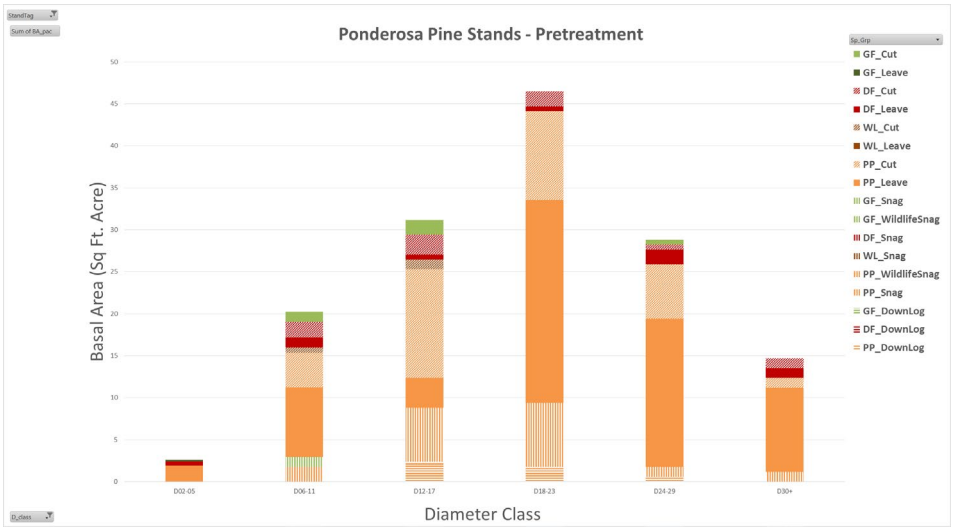
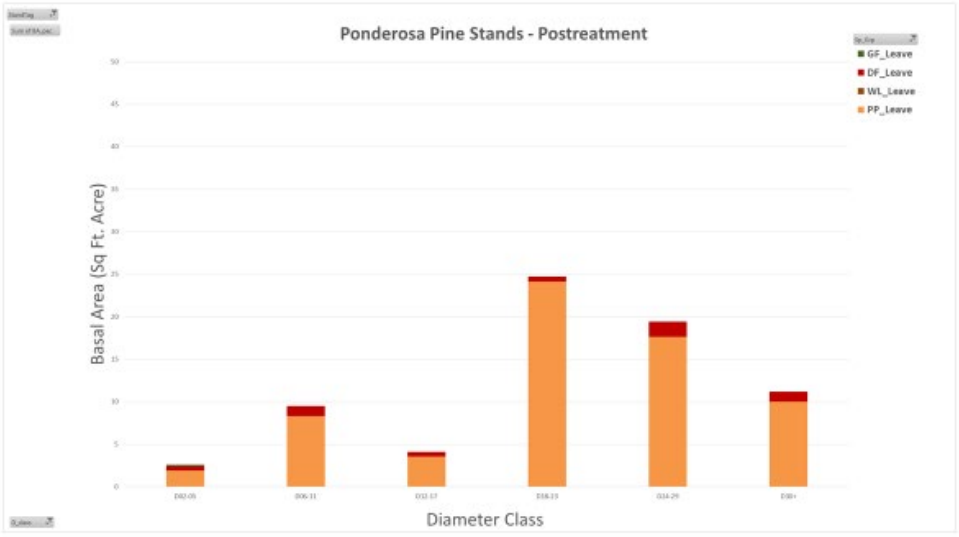


Figure S6: Visualization and Graphical Representation of Stand Conditions Pre and Post-treatment



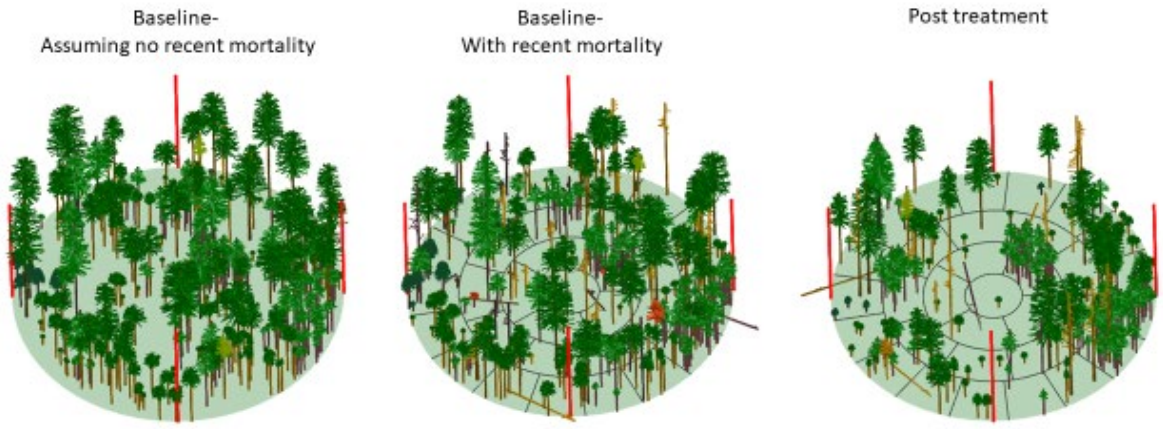


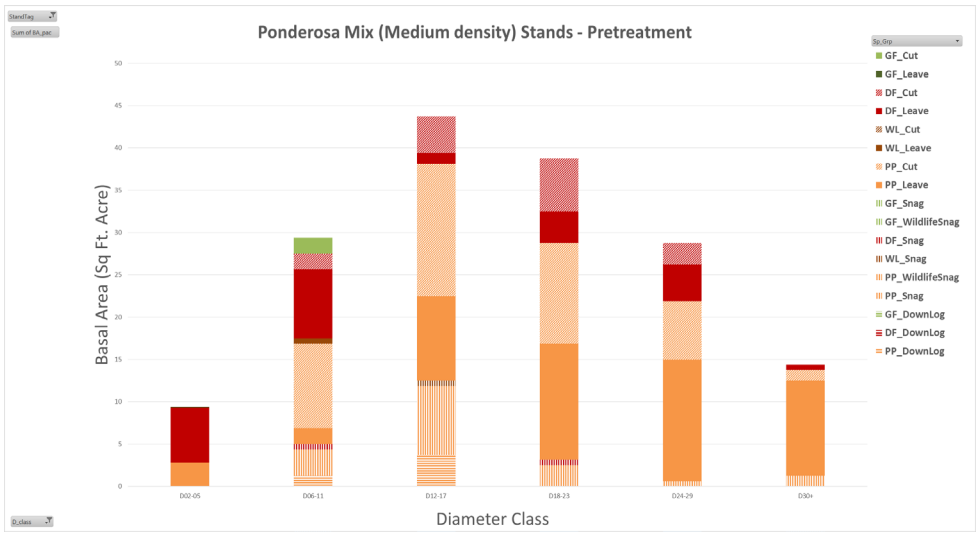
Pretreatment - stands have 120 sq ft. of live trees and 24 sq. feet of recent mortality



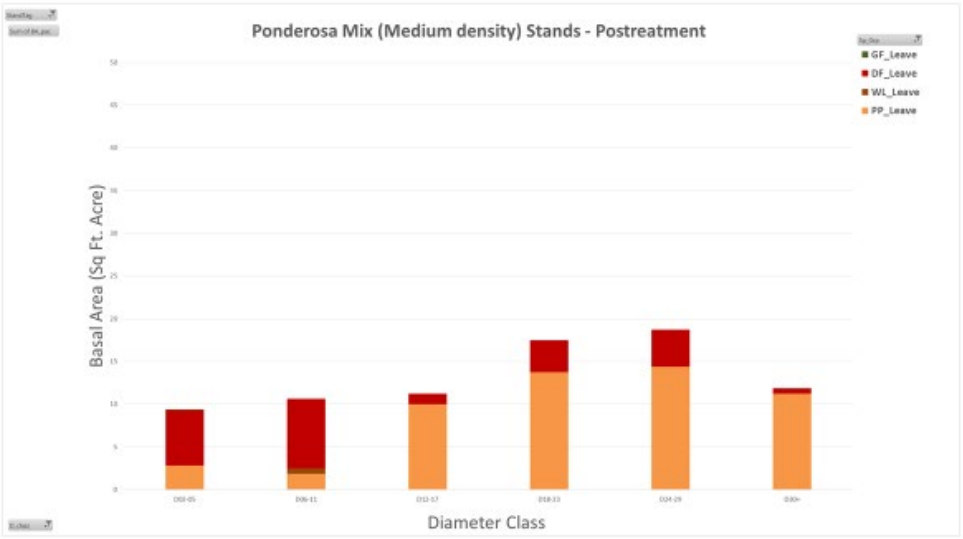
Posttreatment - stands have 71 sq ft. of live trees. Harvest of 49 sq ft of living trees

Pine Mix (Med density) Stands



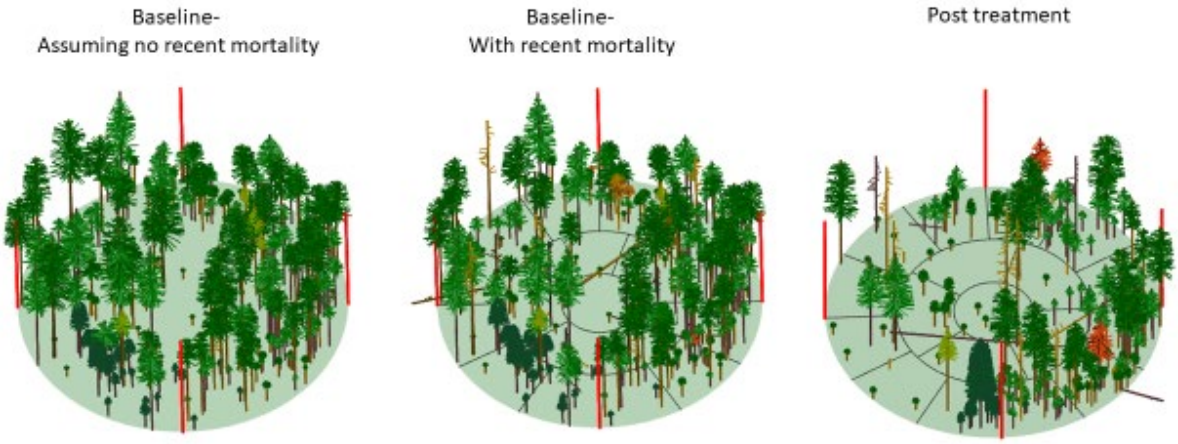


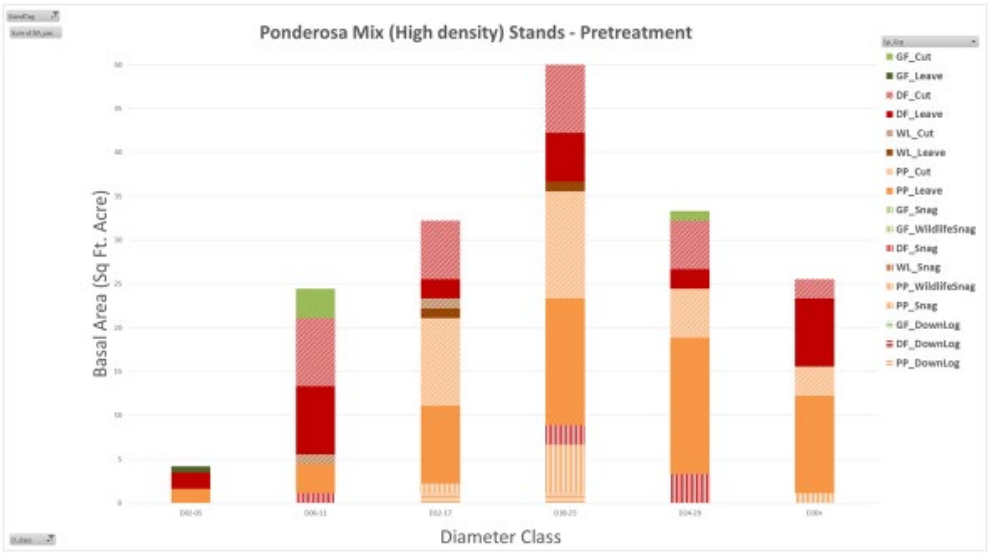
Pretreatment - stands have 142 sq ft. of live trees and 23 sq. feet of recent mortality



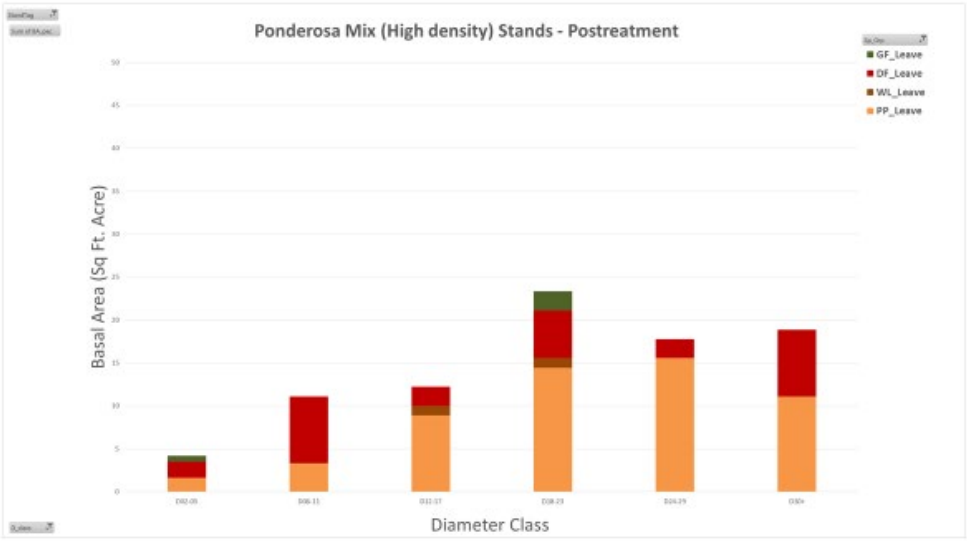
Posttreatment - stands have 79 sq ft. of live trees. Harvest of 63 sq ft of living trees

Pine Mix (High Density) Stands



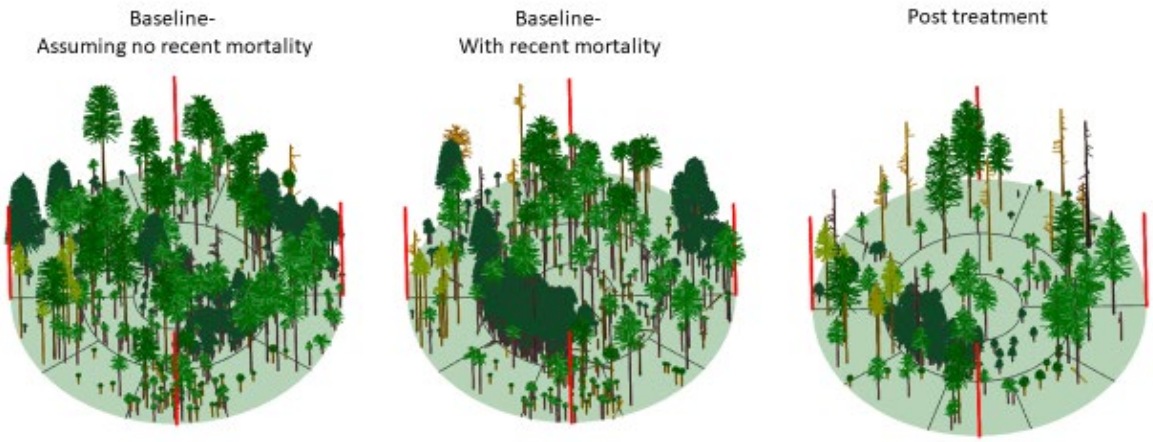


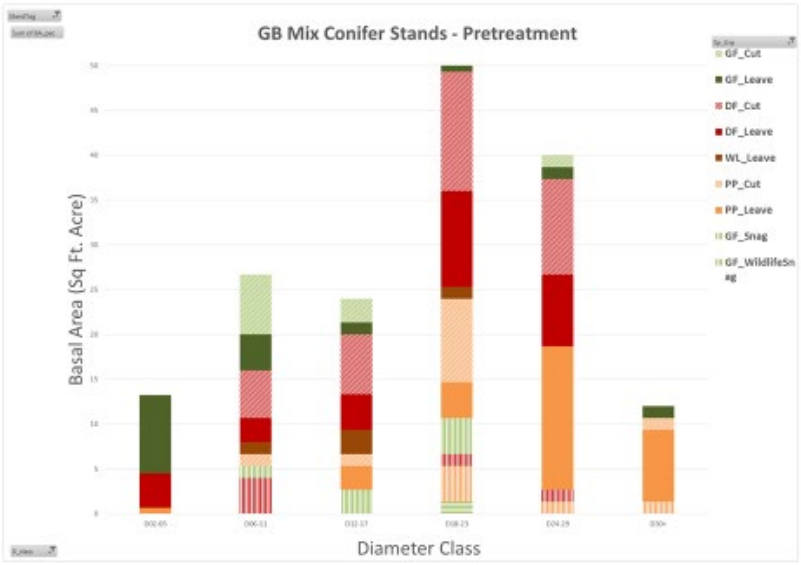
Pretreatment - stands have 161 sq ft. of live trees and 17 sq. feet of recent mortality



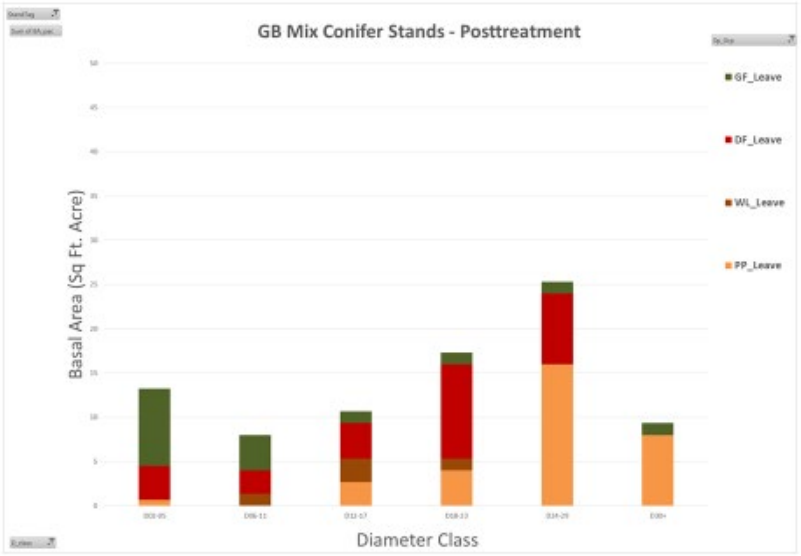
Posttreatment - stands have 88 sq ft. of live trees. Harvest of 73 sq ft of living trees

Mixed Conifer Stands



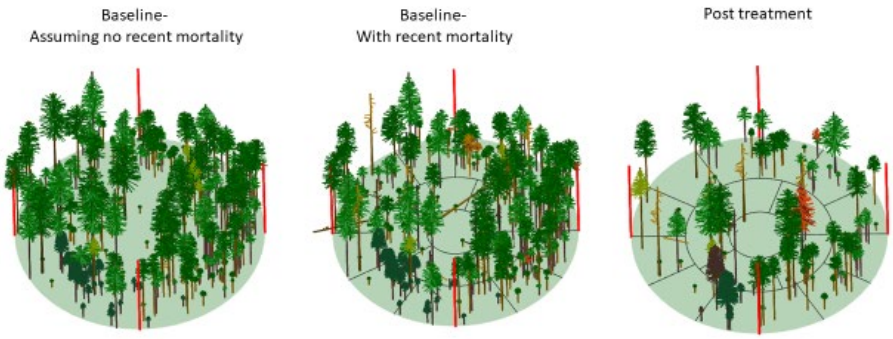


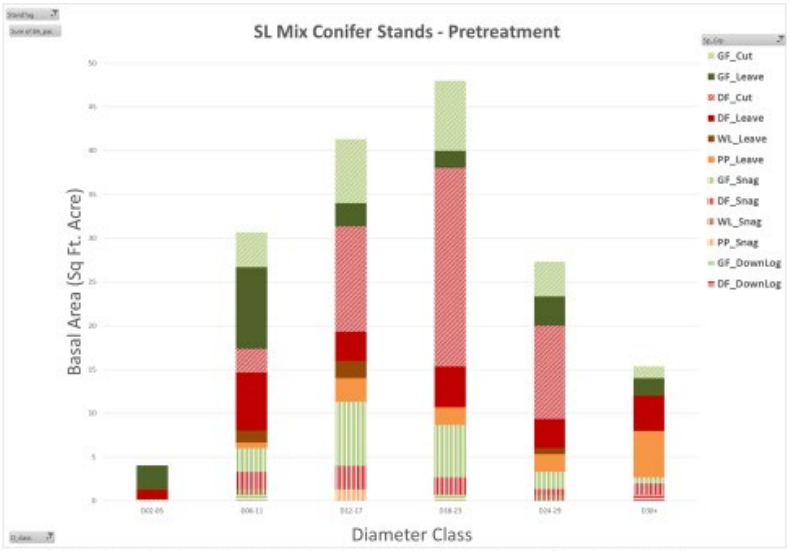
Pretreatment - stands have 149 sq ft. of live trees and 23 sq. feet of recent mortality



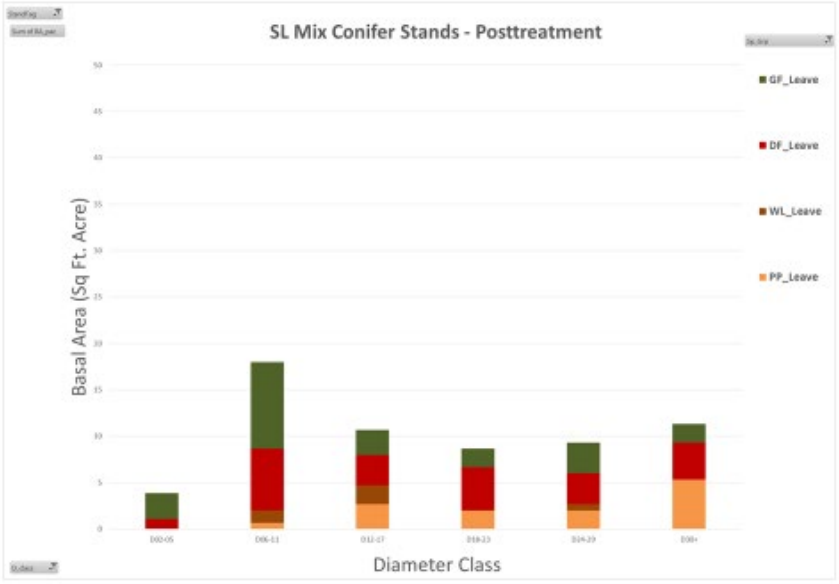
Pretreatment - stands have 84 sq ft. of live trees. 65 sq feet of live trees harvested.

Steep Mixed Conifer Stands





Pretreatment - stands have 135 sq ft. of live trees and 32 sq. feet of recent mortality



Posttreatment - stands have 62 sq ft. of live trees. Harvest of 73 sq ft.

***Supplemental Table ST1**: Stand density conditions in Telephone Ridge Planning Area based on inventory data acquired in 2010-2015. Most stands retain basal areas 2x-3x the recommended stocking management range. Note: recent mortality is not captured by this data, pre-harvest volume cruise data provides better estimates of standing and fallen snags from recent mortality. Abbreviation: QMD- Quadratic Mean Diameter, a measure of average tree diameter in stand.*

Plant Association	Stand ID	QMD	ACRES	Stand Basal Area	BA Management Range	BA Difference
ABGR/ACGL						
	252	9.4	8.9	182	56 - 84	112
	369	8.4	14.8	125	53 - 79	59
	1412	8.4	5.5	190	53 - 79	124
	1445	9.3	0.9	150	56 - 84	80
ABGR/LIBO2		8.8				
	261	12.3	0.5	128	54 - 81	61
	497	11.6	34.8	136	53 - 79	70
	709	8.2	19.3	222	49 - 73	161
	997	12.3	7.9	100	54 - 81	33
	1372	8.2	47.6	134	49 - 73	73
	1396	8.8	12.7	191	50 - 74	129
	1432	8.4	33.8	145	49 - 73	84
	1476	7.3	3.5	230	48 - 71	171
	1498	8.0	18.7	205	49 - 73	144
ABGR/SPBE2						
	1431	9.7	13.8	119	46 - 69	61
ABGR/TABR/LIBO2						
	1472	9.7	111.0	186	71 - 106	98
ABGR/VAME						
	516	10.0	14.9	159	44 - 66	104
PIPO/AGSP		10.0				
	225	10.0	6.5	116	12 - 18	101
PIPO/FEID (Blues)						
	283	4.5	3.4	60	17 - 25	39
PIPO/SYAL						
	224	12.2	14.7	224	72 - 107	134
	301	10.9	40.7	141	70 - 105	54
	305	11.5	14.2	135	71 - 106	46
	321	11.7	11.0	111	71 - 106	22
	340	12.1	14.2	181	72 - 107	91
	456	12.5	5.9	118	73 - 108	27
	469	8.3	14.0	241	66 - 98	159
	526	10.9	11.9	185	70 - 105	98
	1330	10.0	6.6	110	69 - 103	24
	1342	10.7	12.1	132	70 - 104	45
	1368	9.3	14.3	145	68 - 101	60
	1369	13.2	20.9	167	73 - 109	76
	1409	9.6	36.3	93	68 - 102	8

Plant Association	Stand ID	QMD	ACRES	Stand Basal Area	BA Management Range	BA Difference
PIPO/SYAL (cont.)	**1410**	9.9	96.7	152	69 - 103	66
	1343	9.3	22.8	88	68 - 101	3
PSME/HODI						
	501	7.3	12.9	155	74 - 110	63
	664	9.2	66.7	133	78 - 117	36
	1331	9.8	49.6	125	79 - 118	26
	1397	15.6	6.5	186	88 - 132	76
PSME/PHMA						
	234	9.1	12.2	114	52 - 77	49
	273	13.6	31.9	158	57 - 85	87
	275	17.0	29.7	156	60 - 89	81
	287	9.5	11.2	179	52 - 78	114
	334	9.3	27.1	227	52 - 78	162
	346	9.2	2.7	144	52 - 77	79
	349	10.7	8.4	154	53 - 80	88
	359	12.3	62.1	174	56 - 83	104
	370	12.8	24.2	141	56 - 84	71
	371	9.3	9.7	164	52 - 77	100
	439	8.1	17.9	103	50 - 75	41
	485	8.5	0.4	171	51 - 76	108
	660	7.8	10.3	203	50 - 74	141
	1323	8.4	7.5	175	51 - 76	111
	1328	8.4	0.0	134	51 - 76	71
	1336	8.3	6.0	179	50 - 75	117
	1337	8.2	1.7	123	50 - 75	60
	1376	9.6	2.5	151	52 - 78	86
	1378	13.1	15.1	162	56 - 84	92
	1379	10.4	2.2	105	53 - 80	38
	1425	8.3	11.3	132	50 - 75	69
	1455	15.1	15.6	160	58 - 87	87
	1474	7.7	12.0	185	50 - 74	123
	1535	10.1	17.7	137	53 - 79	71
	1536	10.1	0.7	137	53 - 79	71
PSME/SYAL						
	262	9.8	9.2	184	47 - 71	125
	286	9.9	19.9	154	47 - 71	95
	300	11.9	5.7	91	50 - 74	29
	368	8.5	22.7	158	46 - 68	101
	441	8.0	7.9	122	45 - 67	66
	446	7.8	94.7	163	45 - 67	107
	453	9.9	8.7	192	47 - 71	133
	721	11.4	37.0	256	49 - 73	195

Plant Association	Stand ID	QMD	ACRES	Stand Basal Area	BA Management Range	BA Difference
PSME/SYAL (cont.)	**1289**	6.9	26.7	114	44 - 65	59
	1354	9.6	13.4	148	47 - 70	90
	1389	10.8	24.7	144	49 - 72	83
	1402	9.0	4.3	174	46 - 69	116
	1407	8.5	38.0	130	46 - 68	73
	1417	11.1	18.4	223	49 - 72	163
	1428	11.4	31.2	141	49 - 73	80
	1449	9.2	23.7	183	47 - 70	124
	1462	10.8	46.9	106	49 - 72	46
	1475	9.5	0.4	173	47 - 70	115
	1499	9.0	16.4	171	46 - 69	113
	Grand Total		**1620.2**			

***Supplemental Table ST2**: Summary of planning area surveyed and proposed treatment acres by parcel. Abbreviations: A- Allotted Trust; T- Tribal Trust; TF-Tribal Fee; PLSS- Public Land Survey System; CT GB- Commercial thin (Ground Base); CT SL- Commercial Thin (Tether Systems); PCT- Precommercial Thinning. Summary acreages are provided by alternative in the final row of table, all treatement acres are the same between alternatives except the exclusion of all Tether acres in alternative B.*

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
A	513	T2N R35E Sec.31	64.0	59.3	41.6	41.6				0.2
A	514	T2N R35E Sec.31	80.0	78.3	71.4	71.4				
A	547	T2N R35E Sec.32	80.0	79.4	53.5	53.5	25.4	16.5		
A	548	T2N R35E Sec.31, 32	80.0	79.1	61.6	61.6	38.2	23.3		
A	550	T2N R35E Sec.32	80.0	79.2	39.6	39.6	33.0			
A	694	T1N R35E Sec.5, 6	61.6	57.1	53.4	53.4	45.7			
A	764	T1N R35E Sec.5	81.0	80.0	55.0	55.0	49.9			
A	765	T2N R35E Sec.31	80.0	78.3	67.7	67.7	45.0	12.6		
A	766	T2N R35E Sec.32	75.0	73.5	50.7	50.7	24.5	6.3		
A	767	T2N R35E Sec.32	80.0	77.9	74.1	74.1	50.4	10.6		
A	768	T2N R33E Sec.3, T2N R34E Sec.14, T1N R35E Sec.6	80.2	40.4	38.5	38.5	31.0	1.3		
A	808	T2N R35E Sec.20, 21	80.0	6.9	4.0	0.1		0.1		
A	890	T1N R35E Sec.5	42.4	29.7	45.6	29.2	26.5			
A	892	T1N R35E Sec.5	58.2	60.1	52.3	52.3	43.7	7.9		
A	893	T3N R35E Sec.31, T2N R35E Sec.6, T1N	86.0	40.0	34.2	34.2	10.9	17.8		
A	896	T2N R34E Sec.4, 21, T1N R35E Sec.5	80.6	39.9	25.7	25.7	18.2	6.0		
A	898	T2N R35E Sec.32, T1N R33E Sec.1	70.4	39.8	26.1	26.1	14.6	0.3		
A	912	T2N R34E Sec.36, T2N R35E Sec.7	80.0	23.1	23.8	16.2		1.2		9.1
A	916	T1N R35E Sec.5	80.7	12.6	39.8	7.2				

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
A	956	T2N R35E Sec.27	80.0	3.6	33.7	0.4				
A	1021	T2N R35E Sec.28	80.0	11.0	34.8	6.1				
A	1178	T2N R35E Sec.22	80.0	36.2	18.5	15.7		12.9		
A	1191	T2N R35E Sec.28, 33	80.0	21.4	9.6	4.6	3.9			
A	1278	T2N R35E Sec.32, 33	80.0	23.3	15.5	10.8		4.3		
A	1043-A	T1N R35E Sec.5	40.0	40.1	40.1	40.1	38.8			
A	1057-A	T1N R34E Sec.1	16.5	16.0	10.9	10.8	9.5			
A	766-A	T2N R35E Sec.32	5.0	4.9	4.9	4.9	4.8			
T	T1017	T2N R35E Sec.33	80.0	40.2	34.9	26.9				
T	T1018	T2N R35E Sec.33	80.0	63.0	18.7	18.7	6.3		4.5	
T	T1125	T2N R35E Sec.21	80.0	42.1	24.2	22.4		18.1		
T	T2110	T2N R35E Sec.20	80.0	14.8	12.0	8.0	0.1			
T	T2111	T2N R35E Sec.17, 21	80.0	8.3	3.4	3.4		2.8		
T	T2121	T2N R34E Sec.36	40.0	39.5	24.9	24.9	0.1	13.3		
T	T546	T2N R35E Sec.31	80.0	78.4	51.3	51.3	22.0	17.6		10.9
T	T884-C	T1N R34E Sec.1	8.1	10.7	5.7	5.7	3.4	1.1		0.5
T	T884-D	T1N R34E Sec.1	18.1	19.9	10.4	10.5	9.1	1.3		
T	T897	T2N R35E Sec.32	80.0	78.8	56.7	56.7	43.2	6.1		

Ownership	Parcel	PLSS_label	Parcel Gross Acres	Parcel Survey Acres	Parcel Gross Forest Acres	Parcel Survey Forest Acres	CT GB	CT SL	Mechanical PCT	Hand Pile PCT
TF	TF 0110	T2N R35E Sec. 32	40.0	1.5	0.7	0.1				
TF	TF 0133	T2N R35E Sec. 22	80.0	19.7	20.0	12.9				
TF	TF 0140	T2N R35E Sec. 30, 31	80.0	0.0	6.3	0.0				
TF	TF 4660	T2N R35E Sec. 28	80.0	74.9	42.4	42.6	12.2	9.2	6.6	
TF	TF 4670	T2N R35E Sec. 28, 29	680.0	223.2	213.7	76.9	49.1	33.8		
TF	TF 4690	T2N R35E Sec. 20	80.0	11.9	2.6	2.6				
TF	TF 4800	T2N R35E Sec. 21	80.0	45.3	19.4	19.4		13.0		
TF	TF 4900	T2N R35E Sec. 21	160.0	118.1	42.3	40.8	5.6	0.3		
TF	TF 5000	T2N R35E Sec. 21	160.0	159.0	26.4	26.4	1.3	3.7		
TF	TF 6300	T2N R35E Sec. 28	80.0	74.3	25.9	25.9	2.2			
TF	TF 6400	T2N R35E Sec. 28	80.0	78.5	42.9	42.9	29.8	1.6		
TF	TF 6500	T2N R35E Sec. 28	80.0	77.5	16.1	16.0	10.9	1.9	4.8	
TF	TF 6600	T2N R35E Sec. 28	80.0	13.3	3.8	3.3		3.3		
TF	TF 6800	T2N R35E Sec. 30, 31	224.8	44.9	108.7	38.9		11.5	19.3	
TF	TF 6900	T2N R35E Sec. 31, 32	80.0	79.2	43.3	43.3	3.4	14.7		
TF	TF 7000	T2N R35E Sec. 33	160	156.2	108.5	108.6	40.6	4.8		
TOTAL Alternative A			4732.5	2764.0	1991.7	1620.5	753.5	279.3	35.2	20.7
TOTAL Alternative B			4732.5	2764.0	1991.7	1620.5	753.5	**0.0**	35.2	20.7

Appendix B- CTUIR Forest Management Plan Standards (2010 CTUIR Forest Management Plan)

Fundamental Principles

Management strategies that promote the establishment and maintenance of healthy sustainable forest communities must be developed and implemented. Upland meadows, interspersed grasslands, and forest vegetation will be managed for traditional (i.e., Treaty-Reserved) resources (water quality, fish and wildlife habitat, cultural plants) as well as for the production of timber. Riparian areas and wetlands will be managed for production of fish and plant resources.

Grasslands, forests, and their associated riparian areas, springs, seeps, bogs, and meadows must be managed to be fully occupied by native plant communities that have the following characteristics:

• Structural and functional properties of dynamic, multi-aged communities should promote stability, provide resiliency to disturbance, and support overall diversity. Optimally, all age classes of native vegetation should be represented.
• All plant communities should have a high capacity for capturing and retaining water and an inherent ability to provide for long-term stability of critical base stream flows.
• Riparian areas and wetlands should also act as sites for storage of organic material and sediment making this material available to the channel for maintenance of its characteristic high quality fish habitat through time.

Standards are the expressions of biological, physical, and social conditions necessary to sustain upland, riparian and stream ecosystems. Standards are to be monitored at appropriate intervals that are to be defined in the monitoring plan. If standards are not being met in any given sub-watershed, management must be changed to provide for an improving trend in habitat conditions. No activity will be implemented or allowed to continue which could potentially forestall an improving trend in habitat parameters.

Monitoring is a critical part of the adaptive management cycle. The process of restoring and maintaining ecosystem function is implemented through management actions on a site-specific basis. Monitoring of individual plant communities will determine whether or not management actions are achieving the stated goals and objectives and the landscape is moving toward a desired future condition. The result of these monitoring efforts would then be evaluated at the landscape scale to determine the overall health of the area. The conclusions would also be used to make recommendations on whether or not to continue current management or what changes may be needed in management practices to meet goals and objectives. The results could be changes in amount of vegetation treatment or a mix of these factors. Annual monitoring, including completion of compliance inspections, will be critical for the recovery of degraded riparian and upland sites.

Water Quality and Instream Habitat Characteristics

S1. Standard. Forest management practices will be planned and implemented to meet Tribal Water Quality Standards. In stream reaches where water quality does not meet Tribal Standards, forest management activities, including restoration measures, will be implemented to promote measurable improvement in water quality to meet the standards. Select water quality standards that have a high potential to be negatively impacted by forest management activities are described below.

• The highest seven day moving average of daily maximum stream temperatures shall not exceed 50 degrees F in bull trout habitat, 55 degrees F in salmonid spawning habitat, and 64 degrees F in salmonid rearing habitat.
• Bank stability on all streams shall average 80 percent or greater.

• Fine sediments (diam. <0.25in.) shall cover 20 percent or less of the stream channel.

S2. Standard. Riparian Management Zones (RMZ) shall be established that are equal to 75 feet horizontal width times the stream order (modified Strahler) plus the floodplain on each side of all streams (Strahler 1964). The RMZ shall be 300 feet on each side of all fish bearing and perennial streams. The floodplain is defined as the valley floor from toe slope to toe slope.

• Commercial timber harvest within the floodplain is prohibited.
• For that portion of the RMZ outside the floodplain, in the inner 50 percent of the horizontal width, timber harvest is allowed but in dry biophysical environments 80-120 square feet of basal area per acre must be retained while in moist biophysical environments 140-180 square feet of basal area must be maintained. The intent is to maintain potential shade for the site, wood recruitment to the floodplain and stream channels, and high quality cover for wildlife. Equipment operation is prohibited within this portion of the RMZ.
• For that portion of the RMZ outside the floodplain, in the outer 50 percent of the horizontal width, timber harvest must follow the standard basal area retention for the appropriate non RMZ forest stands. Limited equipment operation is allowed within this portion of the RMZ.

S3. Standard. The structural and functional properties of riparian plant communities should promote floodplain, bank, and channel stability, provide resiliency to disturbance, and generate aquatic diversity. All age classes of naturally occurring vegetation should comprise these riparian plant communities. Ground cover should be at least 90 percent of that normally associated with each given site.

Forest Composition

S4. Standard. The areal extent of forest community types will be maintained at approximately the historic level.

S5. Standard. Structural stages of forest community types will be maintained within the Historic Range of Variability (Table 2-1).

S6. Standard. High stand vigor will be maintained through stocking control in order to provide for stand resistance to diseases and insects. “Suggested Stocking Levels for Forest Stands in Northeastern Oregon and Southeastern Washington: An Implementation Guide for the Umatilla National Forest” (Powell 1999) will be used to help develop target stocking levels for stands by plant associations.

Table 2-1. Historic Range Of Variability in Forest Structural Stages.

Biophysical Environment	Structural Stage			
Plant Association Groups (PAG)	Stand Initiation	Stem Exclusion	Understory Reinitiation	Old Growth
Hot Dry Ponderosa Pine/Bluebunch Wheatgrass Ponderosa Pine/Idaho Fescue	5-15%	5-30%	5-25%	5-70%
Warm Dry Ponderosa Pine/Common Snowberry Douglas-fir/Elk Sedge Douglas-fir/Pinegrass Douglas-fir/Common Snowberry Douglas-fir/Mallow Ninebark Grand Fir/Pinegrass	5-15%	5-30%	5-25%	5-70%
Warm Moist Douglas-fir/Creambush Oceanspray	0-30%	0-55%	5-55%	0-30%
Cool Moist Grand Fir/Northern Twinflower Grand Fir/Big Huckleberry	1-15%	1-25%	5-25%	10-60%
Cold Dry Grand Fir/Grouse Whortleberry	1-30%	5-35%	5-30%	1-60%
Cool Dry Lodgepole Pine/Pinegrass	5-15%	10-40%	5-30%	5-70%

Timber Production

S7. Standard. Timber management activities will be applied as a tool to meet multiple resource management objectives. These activities include:
1. Site preparation.
2. Tree improvement including selection of superior seed trees and planting genetic stock.
3. Reforestation by planting, seeding, or natural means.
4. Pre-commercial thinning.
5. Commercial thinning.
6. Sanitation harvest.
7. Salvage harvest.
8. Prescribed fire.

S8. Standard. Silvicultural prescriptions will be prepared for all activities proposing management of forest vegetation to meet resource objectives and should:
1. Consider stand conditions and structure.
2. Consider the silvics of the tree species.
3. Permit the production of a volume of marketable trees sufficient to use all trees that meet utilization standards and are designated for harvest.
4. Permit the use of acceptable logging systems that can remove logs and other forest products without excessive damage to the identified desirable retained vegetation.
5. Achieve multiple management objectives and provide for special management conditions.
6. Use appropriate practices to establish desired species, composition, density, and rates of growth of trees and other vegetation needed to achieve objectives.
7. Promote stand structures and species composition that minimizes serious risk of damage by insects, disease, or wildfire.
8. Assure that lands can be adequately restocked within acceptable time frames.

S9. Standard. Silvicultural prescriptions must address the following:
1. Designation of number and sizes of snags, green wildlife trees, and downed logs that meet the habitat requirements for cavity dependent species.
2. Protection, maintenance, and enhancement of hardwood vegetation.
3. An optimum and minimum stocking level where regeneration harvests are applied.
4. Integrated pest management should be addressed in both the long and short term.
5. The use of prescribed fire as a silvicultural tool in support of returning fire to its natural role in the ecosystem.

S10. Standard. Stand exams and/or data gathering processes will be used to verify or develop silvicultural prescriptions. Data gathering processes will be designed to provide the appropriate detail and accuracy commensurate with the complexity of the silvicultural and resource decisions at hand.

S11. Standard. Harvest will be achieved primarily through use of uneven-aged practices of individual tree and group selection. Even-aged regeneration practices such as shelterwood and seed tree harvests will be used only where necessary to meet management objectives.
1. Individual tree selection should be applied where forest stands contain a variety of size classes, usually three or more, which are evenly distributed on nearly every acre throughout the stand and contain preferred species without significant disease problems.
2. Group selection should be applied where forest stands contain a mosaic of small even-aged patches, where control over species is important, or where significant disease problems are present. Even-aged groups may be as small as one-quarter acre or as large as five acres. The application of group selection will be objective oriented and will depend on the number of age classes desired, the percent of land desired in each class, and desired intervals between harvest entries.

S12. Standard. Salvage harvest will be used to recover economic values of timber killed by events such as wildfire, wind storms, and insects and disease but must be consistent with multi-resource management objectives.

Fire Management

S13. Standard. Utilize Appropriate Management Response (AMR) on all wildland fires.

S14. Standard. Identify areas where use of prescribed fire can help to meet vegetation management objectives

Wildlife/Wildlife Habitat

Big Game Habitat

S15. Standard. Maintain optimum big game summer, transitional, and winter range habitat conditions including high quality cover, forage, water resources (springs, seeps, and riverine), and security habitats to provide viable, harvestable, and sustainable big game populations.

1. Maintain greater than a 40:60 ratio of cover to forage habitats, on a sub-watershed basis, in G-1 Big Game Winter Range F-1 and F-2 Big Game Summer and Transitional Ranges.

2. Maintain minimum tree stocking levels in all Potential Vegetation Groups (PVG) to maintain structural diversity, and thermal/hiding cover for big game and other wildlife resources. Minimum stocking standards are designed to maintain habitat diversity in the form of vertical and horizontal structural diversity and minimum levels of canopy closure to provide at least marginal thermal cover (e.g., 40-69% canopy closure).

Attempt to maintain hiding cover (cover habitat with less than 200 foot sight distances) in the Moist Forest PVG by maintaining vegetative screens within managed timber stands. Hiding cover can be achieved by adjusting harvest prescriptions such that small, non-harvested patches remain within the stand, altering tree spacing, and protecting saplings.

3. Created openings (timbered stands containing less than 30 percent canopy closure in the Dry Forest PVG and 40 percent canopy closure in the Moist Forest PVG) shall not exceed 5 acres in size, with the exception of created openings within the lodgepole pine type. Openings up to 40 acres in size are allowed within this forest type.

Created openings shall be separated by cover stands (marginal or satisfactory thermal cover) greater than 40 acres in size.

When planning created openings in stringer timber environments and adjacent to natural openings, at least 80 percent of the created opening will be located within 600 feet of a thermal cover patch at least 40 acres in size.

Consider a harvested area of commercial forest land a created opening until minimum stocking level is reached and seedling stock consists of live trees 10 feet or greater in height.

4. On big game winter range, a minimum of 10 percent of existing timbered stands within a given ownership should provide satisfactory thermal cover throughout the timber management rotation period.

5. Seed skid trails and landings with appropriate seed mix of native grasses and forbs and/or acceptable native cultivars.

6. Maintain less than 1.0 miles of open road per square mile to maintain big game habitat security and minimize harassment. Road density standards can be achieved by closing roads to motorized vehicles using physical barriers, gates, etc. On roads planned for closure, necessary maintenance should be performed to put the roads in a "self-maintaining" state. Maintenance options can include drainage upkeep, pulling culverts, removing or lowering fills, and other means.

Snag and Log Habitat

S16. Standard. Provide optimum habitat conditions to support viable and sustainable populations of wildlife resources dependent on snag and log habitat.

1. Provide snag levels that are within the historic range of variability (Table 2-2).

Table 2-2. Blue Mountains Large Snag Standards for Various Potential Vegetation Groups and Historic Range Of Variability Categories (Adopted From ICBEMP Supplemental Draft EIS, Appendix 12)

Fire Regime	PVG	Large (21"+) Snags/Ac. HRV Mid	Large Snags/Ac. HRV – 30%	Large Snags/Ac. HRV +30%
High Intensity	Cold Forest	8.1	5.7	10.5
	Dry Forest	2.1	1.5	2.8
	Moist Forest	4.7	3.3	6.2
Low Intensity	Cold Forest	3.0	2.1	3.9
	Dry Forest	0.4	0.3	0.6
	Moist Forest	2.4	1.7	3.2

If 21 inch DBH snags are not available, leave the largest trees for snag retention 12 inches DBH or greater. Tree species of priority for snag habitat standards are ponderosa pine, western larch, grand fir, and Douglas-fir, but priority tree species does not override size requirements.

Snags and recruitment trees protected in RMZ buffers can be factored into snag retention requirements based on proportion of RMZ within a given stand. Snag retention requirements will be achieved on a 20 acre basis. If 10 acres of a 20 acre stand occurs within an RMZ buffer, 50 percent of the snag retention guidelines can be achieved in the RMZ.

Protection of snag clumps is preferable to protecting individual snags within a harvest unit boundary. Clumps should be located in the interior of the harvest unit rather than the edges and should be large enough to allow for adequate protection during logging operations. Generally, there would be 2-3 patches per harvest unit (every 20 acres), but in specific incidents, smaller, but more frequent clumps or individual snags can be left to provide for site productivity and habitat needs.

2. Adequate numbers of green trees shall be retained in harvest units to ensure snag and log habitat can be achieved over time.

Minimum stocking standards shall include at least 6 live trees per acre in the Dry Forest PVG and 12 trees per acre in the Moist PVG greater than 21 inches DBH, where available, for snag recruitment trees. The preferred tree species and size guidelines listed above apply for recruitment standards.

To the extent practicable, all cull trees greater than 21 inches DBH shall be maintained standing and protected through all phases of forest management activities.

3. Maintain large down woody material per the table below for purposes of providing foraging substrate, site productivity, and microsites for microorganisms (Table 2-3a and 2-3b).

Table 2-3a. Blue Mountains Large Downed Wood Specifications for Various Potential Vegetation Groups (Adopted From ICBEMP Supplemental Draft EIS, Appendix 12)

PVG	Piece Length (feet)	Pieces Per Acre	Small End Diameter	Total Linear Length (feet)
Dry Forest	>6	3-6	12"	20-40
Moist Forest	>6	15-20	12"	100-140
Cold Forest	>8	15-20	8"	120-160

Table 2-3b. Blue Mountains Large Downed Wood Standards per Acre by Fire Regime for Various Potential Vegetation Groups and Historic Range Of Variability Categories (Adopted From ICBEMP Supplemental Draft EIS, Appendix 12)

Fire Regime	PVG	LDW/Ac. HRV Mid	LDW/Ac. HRV – 30%	LDW/Ac. HRV +30%
High Intensity	Cold Forest	10.1	7.1	13.2
	Dry Forest	2.7	1.9	3.4
	Moist Forest	7.1	5.0	9.2
Low Intensity	Cold Forest	8.3	5.8	10.8
	Dry Forest	0.7	0.5	0.9
	Moist Forest	0.8	0.6	1.1

Old Growth Habitat

S17. Standard. Harvest of trees greater than 21 inches DBH shall be deferred to protect old growth habitat and late/old structural stages. Trees greater than 21 inches DBH may be harvested when necessary to maintain stocking control.

This interim protection measure will remain in place until completion of a reservation wide assessment of the status of old growth habitat and development of a management plan that addresses existing conditions, historic conditions, and conservation areas.

Special and Unique Habitat Features

S18. Standard. Avoid special and unique habitat features, where practicable. Buffers shall extend three potential tree heights extending from the special or unique habitat feature into the adjacent forest environment to protect micro-site characteristics and integrity of the feature.

S19. Standard. Protect raptor nesting structures (stick nests) during all phases of logging operations. A CTUIR Department of Natural Resources (DNR) Wildlife Biologist will be consulted to determine appropriate measures to protect active nest sites/structures. Protection efforts can include adjustments to harvest unit boundaries, operating seasons, and harvest scheduling.

General Provision

S20. Standard. Avoid logging operations, including road construction/reconstruction during the period December 1 through March 31 to minimize disturbance to wintering big game and March 31 through June 15 on key calving/fawning areas to minimize disturbance during spring reproductive periods. Site-specific modifications to this general provision can be made under appropriate conditions through consultation with a CTUIR DNR Wildlife Biologist.

Threatened and Endangered Species

S21. Standard. Legal and biological requirements for the conservation of endangered, threatened, and sensitive plants and animals will be met.

S22. Standard. The required biological assessment process will be carried out according to the requirements of the Endangered Species Act, as amended. Consultation requirements of the USDI Fish and Wildlife Service and the USDC NOAA Fisheries will be met.

Cultural Resources

S23. Standard. Provide for the documentation, protection, and preservation of prehistoric and historic sites, buildings, objects, antiquities, and contemporary cultural use sites.

S24. Standard. Project level cultural resource inventories will be carried out.

S25. Standard. Design projects to avoid damage or disturbance to historic properties and develop appropriate avoidance measures or mitigation procedures in the event cultural sites are encountered.

S26. Standard. Cultural resource management will be coordinated with the Department of Natural Resources Cultural Resources Protection Program.

S27. Standard. Ethno-botanical or cultural plant maps will be prepared for use in management of cultural plants. These maps will be updated as additional information on the locations of edible, non-edible, and medicinal cultural plants becomes available. Monitoring of cultural plants will be at the project and forest wide level.

Transportation

S28. Standard. Road access will be adequate to accomplish commercial, resource, and protection management activities as well as subsistence use. Operate and maintain all roads according to management emphasis and maintenance levels appropriate to planned uses and activities, safety, economics, and impacts on land and resources.

S29. Standard. Road access may be restricted due to road structural limitations, safety considerations, road standards, or limitations imposed by resource management.

S30. Standard. For roads that are designated as part of the Indian Reservation Roads (IRR) Program, closures must be undertaken consistent with the provisions of Title 25 Code of Federal Regulations, Part 170. For roads not designated as part of the IRR Program, closures will be based on the following criteria:

1. Need to protect soil and water.
2. Need to maintain or improve habitat for wildlife.
3. Need to protect critical cultural values.
4. Expected need or use.
5. Safety of expected users.
6. Need to protect the road.
7. Cost of maintenance.

S31. Standard. All new or relocated roads will be located in stable areas outside riparian buffers, floodplains, wetlands, or meadows to the extent possible.

S32. Standard. All roads shall be designed and constructed to limit alteration of natural slopes and drainage patterns to that which will safely accommodate the anticipated use of the road while protecting water quality.

S33. Standard. Roads shall be designed with a drainage system using grade reversals, surface sloping, ditches, culverts, and/or water bars as necessary to effectively control and disperse surface water to minimize erosion.

S34. Standard. Road drainage systems will be designed so that they are not connected with natural surface channels. Ditch and relief culverts will drain into a protected buffer area a sufficient distance from any surface channel to allow for infiltration.

S35. Standard. Relief culverts will have sufficient slope to drain the ditch and be provided with sediment control structures.

S36. Standard. Relief culvert size and spacing will be determined by surface area serviced by the culvert, soil type, particle size, relief ditch gradient and other relevant factors.

S37. Standard. All new road construction/reconstruction not completed by the end of the field season, roads with construction completed, and closed roads will have erosion control measures in place at the earliest practicable date. Cut and fill slopes will be seeded. Fertilizer and mulch will also be applied.

Air Quality

S38. Standard. All prescribed burning will be in accordance with state and/or Tribal smoke management plans.

S39. Standard. Available predictive models and methods will be used to minimize impacts of prescribed burning.

Monitoring and Evaluation

S40. Standard. Monitoring and evaluation must be provided to insure that the standards provided are met or that there is an upward trend towards meeting those standards.

S41. Standard. Monitoring will necessarily be integrated between CTUIR natural resource management and regulatory programs.

Confederated Tribes *of the*
Umatilla Indian Reservation

Natural Resources Commission

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PUBLIC HEARING NOTICE DISSEMINATION RECORD

File #: CU-23-001; Conditional Use request filed by CTUIR Department of Natural Resources – Range, Agriculture & Forestry Program, 46411 Timíne Way, Pendleton, OR 97801

Land Protection Planning Commission Public Hearing Date: February 28, 2023

Newspaper and Date Published;	East Oregonian:	February 18, 2023
	CUJ:	February 2, 2023

Posted in six public Places;

1.	Mission Market:	February 17, 2023
2.	Yellowhawk Tribal Health Clinic:	February 17, 2023
3.	BIA Umatilla Agency:	February 17, 2023
4.	CTUIR Housing Department:	February 17, 2023
5.	Nixyáawii Governance Center	February 17, 2023
6.	CTUIR web site: https://ctuir.org/events/lppc-public-hearing-cu-23-001/	

Attached are copies of the public hearing notices that were posted, published and mailed to all interested parties, subject property owners and adjacent property owners, as required by Land Development Code Section 13.020.

Confederated Tribes *of the*
Umatilla Indian Reservation

Land Planning and Protection Commission

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PUBLIC HEARING NOTICE

NOTICE IS HEREBY GIVEN that the Land Protection Planning Commission (LPPC) of the Confederated Tribes of the Umatilla Indian Reservation will hold the following public hearings:

Conditional Use File #CU-23-001 – **Applicant, CTUIR Department of Natural Resources – Range, Agricultural and Forestry Program** seeks approval from the Land Protection Planning Commission to complete a timber harvest on multiple lots owned by the CTUIR in fee and trust. The subject properties are identified as tax lots 110, 133, 140, 4660, 4670, 4690, 4800, 4900, 5000, 6300, 6400, 6500, 6600, 6800, 6900, and 7000 within Umatilla County Tax Map 2N35 in sections 20, 21, 22, 30, 31, and 32 along with trust lots 513, 514, 547, 548, 550, 694, 764, 765, 766, 767, 768, 808, 890, 892, 893, 896, 898, 912, 916, 956, 1021, 1178, 1191, 1278, 1043-A, 1057-A, 766-A, T1017, T1018, T1125, T2110, T2111, T2121, T546, T844-C, T844-D, and T897. All tax lots are within the external boundaries of the Umatilla Indian Reservation. The proposed harvest would be a commercial thinning and timber harvest within the taxlots to reduce fire danger and improve forest health. The subject properties are zoned G-1, Big Game Grazing, where a timber harvest to remove more than 5,000 board foot gross is listed as a Conditional Use. Conditional Use approvals are subject to the CTUIR Land Development Code Chapters 6 and 13.

The hearing will be held on **Tuesday, February 28, 2023 beginning at 9:00 a.m.** Individuals may attend the meeting in the Walúula and Wanaqit conference rooms at the Nixyáawii Governance Center, virtually, or by phone. Information on joining the meeting online is available at https://ctuir.org/events/lppc-public-hearing-cu-23-001/. Participation in the hearing will also be available by phone at 321-754-9526 starting at 9:00 a.m. on the day of the hearing. The meeting ID will be 946 606 106#.

Staff reports and other materials pertaining to the hearing are available for review at the link above, or can be requested from the Tribal Planning Office by calling 541-276-3099.

The public is entitled and encouraged to participate in the hearing and submit testimony regarding the request. Written comments may be sent to tpo@ctuir.org or to the Tribal Planning Office at 46411 Timíne Way Pendleton, OR 97801 for receipt by 4:00 p.m. February 27, 2023.

PUBLIC HEARING NOTICE

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Conditional Use File #CU-23-001 – **Applicant, CTUIR Department of Natural Resources – Range, Agricultural and Forestry Program** seeks approval from the Land Protection Planning Commission to complete a timber harvest on multiple lots owned by the CTUIR in fee and trust. The subject properties are identified as tax lots 110, 133, 140, 4660, 4670, 4690, 4800, 4900, 5000, 6300, 6400, 6500, 6600, 6800, 6900, and 7000 within Umatilla County Tax Map 2N35 in sections 20, 21, 22, 30, 31, and 32 along with trust lots 513, 514, 547, 548, 550, 694, 764, 765, 766, 767, 768, 808, 890, 892, 893, 896, 898, 912, 916, 956, 1021, 1178, 1191, 1278, 1043-A, 1057-A, 766-A, T1017, T1018, T1125, T2110, T2111, T2121, T546, T844-C, T844-D, and T897. All tax lots are within the external boundaries of the Umatilla Indian Reservation. The proposed harvest would be a commercial thinning and timber harvest within the taxlots to reduce fire danger and improve forest health. The subject properties are zoned G-1, Big Game Grazing, where a timber harvest to remove more than 5,000 board foot gross is listed as a Conditional Use. Conditional Use approvals are subject to the CTUIR Land Development Code Chapters 6 and 13.

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Confederated Tribes *of the*
Umatilla Indian Reservation
Tribal Planning Office

Zoning, Development Permits
Environmental Health & Public Transit

46411 Timíne Way
Pendleton, OR 97801

www.ctuir.org
Phone 541-276-3099
email: info@ctuir.org
Fax: 541-276-3099

February 17, 2023

PUBLIC HEARING NOTICE

Dear Property Owner:

On February 28, 2023 the Land Protection Planning Commission of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) will hold a public hearing concerning a Conditional Use request as described below. You are receiving this notice because you are an owner of property located within 250 feet of the subject property (see map enclosed). According to Section 13.020 of the CTUIR Land Development Code, all owners of property located within 250 feet of the property which is the subject of a public hearing shall be given written notice by mail at least ten days prior to a public hearing.

Conditional Use File #CU-23-001 – **Applicant, CTUIR Department of Natural Resources – Range, Agricultural and Forestry Program** seeks approval from the Land Protection Planning Commission to complete a timber harvest on multiple lots owned by the CTUIR in fee and trust. The subject properties are identified as tax lots 110, 133, 140, 4660, 4670, 4690, 4800, 4900, 5000, 6300, 6400, 6500, 6600, 6800, 6900, and 7000 within Umatilla County Tax Map 2N35 in sections 20, 21, 22, 30, 31, and 32 along with trust lots 513, 514, 547, 548, 550, 694, 764, 765, 766, 767, 768, 808, 890, 892, 893, 896, 898, 912, 916, 956, 1021, 1178, 1191, 1278, 1043-A, 1057-A, 766-A, T1017, T1018, T1125, T2110, T2111, T2121, T546, T844-C, T844-D, and T897. All tax lots are within the external boundaries of the Umatilla Indian Reservation. The proposed harvest would be a commercial thinning and timber harvest within the taxlots to reduce fire danger and improve forest health. The subject properties are zoned G-1, Big Game Grazing, where a timber harvest to remove more than 5,000 board foot gross is listed as a Conditional Use. Conditional Use approvals are subject to the CTUIR Land Development Code Chapters 6 and 13.

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Staff reports and other materials pertaining to the hearing are available for review at the link above, or can be requested from the Tribal Planning Office by calling 541-276-3099.

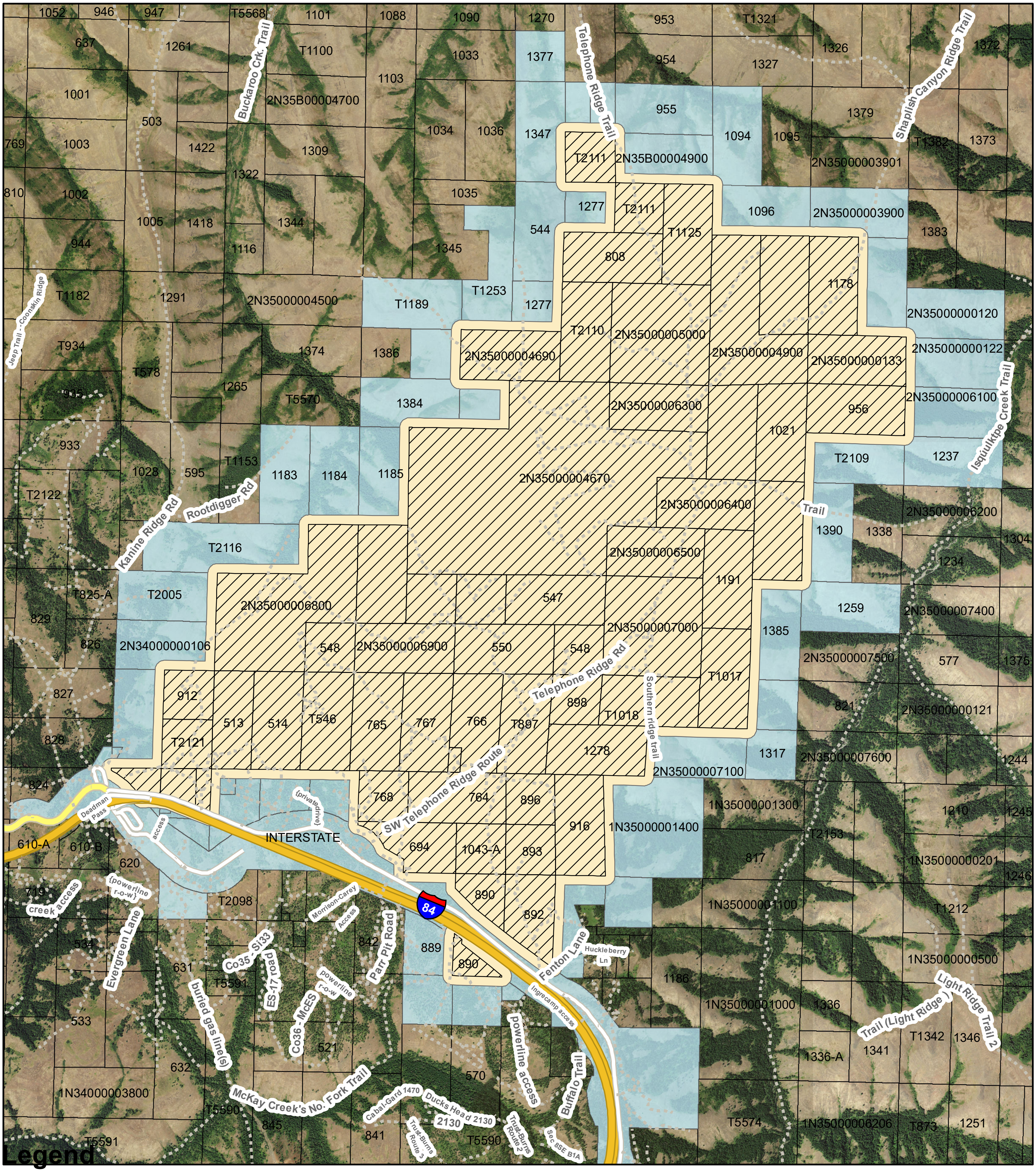
Additionally, the public is entitled and encouraged to participate in the hearing and to submit testimony regarding the request. Please submit comments to the Tribal Planning Office by 4:00 pm February 27, 2023 either as a hard copy or by e-mailing them to tpo@ctuir.org.

To obtain further information or if you have questions regarding the hearing process or the proposed conditional use, please contact the Tribal Planning Office at 46411 Timíne Way, Pendleton, OR 97801 or call (541) 276-3099.

Sincerely,

Lora Elliott
Assistant Planner

CU-23-001 Public Notification Recipients



Legend

- UIR Taxlots selection
- Subject Parcels
- ProjectBuffer
- Public Notification Recipients
- UIR Taxlots

N

0 1,125 2,250 4,500 6,750 9,000 Feet

CU-22-003 Public Notice Recipients

Trust & Allotment Recipients

Ownership	Parcel ID
A	513
A	514
A	521
A	544
A	547
A	548
A	550
A	690
A	694
A	764
A	765
A	766
A	767
A	808
A	877
A	879
A	889
A	890
A	892
A	893
A	896
A	898
A	912
A	916
A	955
A	956
A	1021
A	1094
A	1096
A	1178
A	1183
A	1184
A	1185
A	1191
A	1202

Ownership	Parcel ID
A	1237
A	1259
A	1277
A	1278
A	1317
A	1347
A	1377
A	1384
A	1385
A	1390
A	1424
A	2034
A	1043-A
A	1057-A
A	766-A
A	WW165
A	WW479-B
T	T1017
T	T1018
T	T1125
T	T1125
T	T1189
T	T1253
T	T2005
T	T2109
T	T2110
T	T2111
T	T2116
T	T2121
T	T2136
T	T546
T	T5585
T	T884-C
T	T884-D
T	T897

Taxlot Recipients

Ownership	Taxlot	Owner
F	1N33000008800	State of Oregon
F	1N34000000100	CTUIR
F	1N34000000118	Ashley Winn
F	1N34000000125	Carol Servin (TRS) (Et. Al.)
F	1N34000000126	Brett & Janet Cook
F	1N35000001901	Driftwood Meacham, LLC
F	1N35000001902	Driftwood Meacham, LLC

F	1N3505DD00400	James & Melissa Korecky
F	1N35060000100	Darrell Nordyke
F	1N35060000200	John Van Gelder
F	1N35060000300	David & Oriel Galle
F	1N35060000400	David & Oriel Galle
F	1N35080000600	John & Angela Boston
F	2N33030000100	Jack Duff Ranches, Inc.
F	2N33030000303	Scott & Terri Sullivan
F	2N33030000304	Royce Hack
F	2N33030000400	Charles & Diana Hack
F	2N33030000601	George Ruby & Leanne Galtin-Ruby
F	2N34000000106	Robert & Kathryn Picard
F	2N34000008800	Price and Daughters, LLC
F	2N34000008801	State of Oregon
F	2N35000000122	Rocky Worthing Ingalls
TF	2N35000000143	Randy & Darcy Palmore
TF	1N35000001400	CTUIR
TF	1N35080000700	CTUIR
TF	2N35000000110	CTUIR
TF	2N35000000117	CTUIR
TF	2N35000000120	CTUIR
TF	2N35000000133	CTUIR
TF	2N35000000140	CTUIR
TF	2N35000003900	CTUIR
TF	2N35000004600	CTUIR
TF	2N35000004660	CTUIR
TF	2N35000004670	CTUIR
TF	2N35000004680	CTUIR
TF	2N35000004690	CTUIR
TF	2N35000004800	CTUIR
TF	2N35000004900	CTUIR
TF	2N35000005000	CTUIR
TF	2N35000006100	CTUIR
TF	2N35000006300	CTUIR
TF	2N35000006400	CTUIR
TF	2N35000006500	CTUIR
TF	2N35000006600	CTUIR
TF	2N35000006800	CTUIR
TF	2N35000006900	CTUIR
TF	2N35000007000	CTUIR
TF	2N35000007100	CTUIR
TF	2N35000007200	CTUIR
TF	2N35B00004900	CTUIR

Agency Recipients

Contact	Agency	Address
Florinda Coleman	UEC	P.O. Box 1148 Hermiston, OR 97838-3148
Superintendent	BIA	via e-mail
Hans Rudolph	ODF	1055 Airport Road Pendleton, OR 97801
District #12	ODOT	1327 SE 3rd Street Pendleton, OR 97801
Kirk Barham Eastern District Manager	OPRD	72214 Marina Lane Joseph, OR 97846

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MEMORANDUM

DATE: January 18, 2023
TO: Tribal Staff Review Committee & Forest Practices Tribal Interdisciplinary Team
FROM: Lora Elliott, Assistant Planner, Tribal Planning Office
REGARDING: Meeting Thursday, February 2, 2023, **10:00 am, in the Waluula and Wanaquit Conference Rooms at the Nixyáawii Governance Center or via Microsoft Teams**

The Tribal Staff Review Committee will meet on Thursday, February 2, 2023 at 10:00 am to review the following application:

Conditional Use File #CU-23-001 – **Applicant, CTUIR Department of Natural Resources – Range, Agricultural and Forestry Program** seeks approval from the Land Protection Planning Commission to complete a timber harvest on multiple lots owned by the CTUIR in fee and trust. The subject properties are identified as Tax Lots 110, 133, 140, 4660, 4670, 4690, 4800, 4900, 5000, 6300, 6400, 6500, 6600, 6800, 6900, and 7000 within Umatilla County Tax Map 2N35 in sections 20, 21, 22, 30, 31, and 32 along with trust lots 513, 514, 547, 548, 550, 694, 764, 765, 766, 767, 768, 808, 890, 892, 893, 896, 898, 912, 916, 956, 1021, 1178, 1191, 1278, 1043-A, 1057-A, 766-A, T1017, T1018, T1125, T2110, T2111, T2121, T546, T844-C, T844-D, and T897 all within the external boundaries of the Umatilla Indian Reservation. The proposed harvest would be a timber harvest within the taxlots to reduce fire danger and improve forest health. The subject property is zoned G-1, Big Game Grazing, where a timber harvest to remove more than 5,000 board foot gross is listed as a Conditional Use. Conditional Use approvals are subject to the CTUIR Land Development Code Chapters 6 and 13.

You may attend this combined TSRC & TIDT meeting in person or through Microsoft Teams Video Conference:

Microsoft Teams meeting
Join on your computer, mobile app or room device
Click here to join the meeting
Meeting ID: 298 102 890 478 | Passcode: fV4mg3
Or call in (audio only)
+1 321-754-9526,,290144636# | phone conference ID: 491 146 244#

The application and supporting materials for this request are posted on the **Free4all shared Drive** in the **TPO** folder. If you have questions or need further information, please contact Lora Elliott at 541-429-7524.

Each committee member should review the proposals:

- To determine its compatibility with the Tribes' Comprehensive Plan, Land Development Code, and other Tribal Statutes, Resolutions, and Policies;
- To determine the overall impacts this request may impose on Tribal services and utilities, the environment, wildlife, and on the Reservation

Please see application materials on the Z:/drive. Written comments will be accepted until the end of the day on Thursday, February 9, 2023.

A public hearing with the Land Planning Protection Commission is proposed to be scheduled for February 28, 2023 at 9:00 a.m.

From: Kristen Tiede
To: Lora Elliott
Cc: Patty Perry; Carey Miller
Subject: RE: TSRC-TIDT Comments for CU-23-001
Date: Monday, February 13, 2023 2:26:37 PM
Attachments: image001.png

Hi Lora,

Thank you for the reminder regarding comments for the CU-23-001 staff report.

The CRPP conducted a pedestrian survey of the area of potential effect for the Telephone Ridge Timber Sale (CU-23-001) in summer of 2022. The CRPP surveyed approximately 1,721 acres, attempted to relocate 25 previously documented sources, and documented 22 new resources. The report is pending. The cultural resources will need to be avoided during implementation of the timber sale. If resources cannot be avoided during implementation, RAF will need to work with CRPP and the THPO resolve those effects either by minimizing the adverse effects and/or mitigating for the adverse effects to the resources. The THPO and BIA will need to sign off on the effects to historic properties before the project may move forward.

Kristen

Kristen Tiede
Archaeologist
Cultural Resources Protection Program
Confederated Tribes of the Umatilla Indian Reservation
46411 Timíne Way, Pendleton, OR 97801
Direct Line/Fax: (541) 429-7206
Main Office: (541) 276-3447
KristenTiede@ctuir.org

From: Lora Elliott
Sent: Friday, February 10, 2023 12:03 PM
To: Kelly Warren <KellyWarren@ctuir.org>; Kristen Tiede <KristenTiede@ctuir.org>
Cc: Patty Perry <PattyPerry@ctuir.org>
Subject: TSRC-TIDT Comments for CU-23-001

Hi Kelly & Kristen,

I'm working on the staff report for CU-23-001 for the Telephone Ridge Timber Harvest, and I was hoping you two could get your comments on the project in writing so I don't misrepresent any of the permitting requirements, etc. from your programs.

I need to send out the staff report next Friday, so it would be helpful to get your comments by next Tuesday (2/14/2023) so I have a chance to incorporate them into the staff report.

Thanks,

Lora Elliott
Assistant Planner | Tribal Planning Office
Confederated Tribes of the Umatilla Indian Reservation
46411 Timíne Way, Pendleton, OR 97801
☎: (541) 429-7524 | ✉: loraelliott@ctuir.org

From: Kelly Warren
To: Lora Elliott
Cc: Patty Perry; David Haire
Subject: RE: TSRC-TIDT Comments for CU-23-001
Date: Friday, February 10, 2023 1:10:14 PM

Lora:
The WRP interprets the Water Code as CU-23-001 meets the requirements for the Area of Application for a Stream Zone Alteration permit.
However, the WRP also believes CU-23-001, Telephone Ridge Timber Harvest is eligible for a Director's waiver from the requirement as the Harvest Plan exceeds requirements of the Forest Management Plan and the Senior Forester has committed to protecting by buffer all springs, seeps, meadows and wetlands on the project. Therefore the project should meet or exceed the requirements set forth in the Stream Zone Alteration Standards.
Water Resource staff will survey the project area, identify, locate and measure the project springs, seeps, meadows and wetlands prior to timber harvest activities if the Director-DNR approves the waiver. If a waiver is not requested or granted the WRP will require a Stream Zone Alteration permit conditioned to protect the same areas.

Status:
The Water Code Administrator has provided a draft waiver request to the Senior Forester with the option to submit a waiver request to the Director or apply for a SZA permit for the project. The Senior Forester is currently on leave until February 16th and the WRP manager may also be out next week. The determination of waiver or SZA application may not be made prior to the LPPC hearing.

Kelly K. Warren, Water Code Adm.
Department of Natural Resources
Confederated Tribes of the Umatilla Indian Reservation (CTUIR)
46411 TiMine Way
Pendleton, OR 97801
(541) 429-7273 office
(541) 969-9480 cell

From: Lora Elliott
Sent: Friday, February 10, 2023 12:03 PM
To: Kelly Warren <KellyWarren@ctuir.org>; Kristen Tiede <KristenTiede@ctuir.org>
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