July 17, 2019

Duane F. Bishop, District Ranger
Jonathan Tucker, Middle Fork District Planner
Middle Fork Ranger District
Willamette National Forest
46375 Highway 58
Westfir, OR 97492

***

submitted via CARA at https://cara.ecosystem-management.org/Public//CommentInput?Project=55868

RE: Youngs Rock Rigdon EIS

Please consider the following scoping comments of Cascadia Wildlands regarding the Youngs Rock Rigdon EIS. Cascadia Wildlands is a regional non-profit based in Eugene, Oregon, representing nearly 10,000 members across the country. Cascadia Wildlands works to protect and restore the wildlands and species in the Cascadia bioregion. Our members live and play in the area and are dependent on the forests for clean water, fish, clean air, stable property values, and recreation. Our primary interest in this project is conservation of wildland values, in particular forest habitat and watershed function.

Purpose and Need

The stated overall purpose of this project is to "restore and enhance" the ecological, social and economic aspects of the landscape. That is an incredibly broad purpose that will need to be more specifically rationalized in the EIS. We are particularly interested in discovering more precisely the restoration logic of this project. The action is said to be "needed to improve stand and landscape diversity, structure and resiliency," which evidently equates to more open forest. This supposition is a major change of course from past belief among scientists, so it is very important the EIS give that issue a hard look.

Regarding "hazardous fuels," there too the project effects on wildfire (and wildfire effects on the project) need to be given a critical look applying good science. We know that the USFS has the capability to do a world-class analysis of the fire issue here, and look forward to that happening.

We strongly and enthusiastically support the purpose and need to be achieve a minimum road system. Meeting that need includes both resource restoration actions (e.g. floodplain restoration, culvert fixes, obliterating and closing roads) as well as access-providing actions (road maintenance, restoration and construction of roads, trails, parking, boat ramps and other infrastructure).

Restoration: The project purpose and need and proposed action should be clear about its restoration goals and justification. Would it be possible to do the desired restoration in this area while removing fewer trees per acre and retaining more trees in the 20-30" diameter class? Can a sideboard be placed on only removing trees that originated after Euro-American settlement and fire suppression? If so, the Forest Service should consider those options. The EIS should develop a full range of alternatives that resolve trade-offs in different ways. Trade-offs such as open forest vs closed canopy habitat, roads and logging volume vs snag habitat, carbon storage, etc.

Precaution & Uncertainty

Good intentions can be the most dangerous. Because the intentions are good, it can be psychologically more difficult to challenge assumptions, to be patient, or to accept our own limits. And, faced with large problems for which we collectively share some share of the guilt, the urge to action can and very often does overwhelm reason. The proposal here is a very intensive, aggressive manipulation of the forest. It demands humility. A project like this needs to clear a high bar in terms of the quality of information and certainty in judgements. Please take a hard look, applying the best science and discussing any scientific controversies and areas of uncertainty, at all significant aspects of proposed treatments. We are especially interested in available studies and monitoring data from similar treatments, such as the adjacent Jims Creek, and in long-term projections for vegetation under different scenarios.

Collaborative and NEPA compliance

Cascadia Wildlands is not a member of any Collaborative. We think it's great that others are, and are happy to see that this project has grown out of an extensive official collaborative organization. Our organization would like to support those efforts how we can, however we also need to ensure that the collaborative process does not replace or diminish the legal and scientific process under NEPA. Our organization and many of our members and supporters are very interested in this project, and would like to be involved in developing this project. It can be frustrating where different tiers of public involvement develop, with one receiving high quality information and rapid responses to questions, and the other provided only legal minimums for notice and mostly ignored. So, in the spirit of a successful collaborative and democratic government, please ensure that information regarding this project is publicly available and publicly disseminated. Please ensure that the best available science is rigorously applied through the NEPA process, without bias, and that the decisions are actually made through the NEPA process. We have every confidence that this can and will be achieved here.

Tradeoffs

It is evident that even the best case scenario under *any* of the alternatives (including no action) would involve serious tradeoffs. An essential role of the EIS here is to honestly lay those tradeoffs out on the table so that the best decision can be made. A few of the higher-priority tradeoffs we expect to be major issues:

- Loss of wet forest habitat to logging; versus reduced chance of that forest being lost to wildfire or some other cause (e.g. climate change) as a result of proposed logging;
- Loss of denser, wetter forest; versus gain of more open, drier forest type.
- Increase in frequency of low-intensity burns has harms (smoke, safety hazard, recreation closures, political difficulty of "let it burn" USFS policy, etc.) as well as benefits (ecological restoration!)
- Among wildlife species, losers are likely to be Northern Spotted Owl, Red tree vole; winners likely to be butterflies, elk.

Implementation, Monitoring, and Maintenance

Moist vs Dry Forest Stands: While the project contains both moist and dry native forest stands with distinct species composition and biotic needs, the sale documents do not yet distinguish different treatment plans for these stands. The sale contains many moist forest stands that do not currently support pine and oak populations. Thinning for restoration of dry, fire-adapted species should focus in stands with existing pine habitat and dry mixed conifer stands and should avoid heavily removing trees in healthy moist forest. Please be clear in all documents about how treatment plans vary between these two types of forests.

The difficult problem of sorting out these needs, consequences and tradeoffs is only half the battle. Even more uncertain and difficult will be the actual methods for implementation. The restoration rationales here require long-term investment in a new approach at this location, not only a one-time timber sale. So, please take care in the EIS to address:

- Specific project implementation
    - what prescriptions for units, exactly
    - what evidence and what level of certainty are there regarding effectiveness of those prescriptions to create the desired result.
- Monitoring. This project is essentially an experimental approach. Both implementation and effectiveness monitoring will need to be specially designed and carried out, given the unique nature of the place and of the project.
- Long-term stand maintenance of oak/pine and meadows. The specific mid and long-term maintenance needs ought to be specifically addressed, with care to address consequences if that maintenance is not done. Will future thinning be required if fires do not burn? Will prescribed fires be required? Will stand maintenance require additional roading of the area?

Protecting Forest Systems: A similar project to restore open forest and mixed conifer fire resilient habitat was conducted in the nearby Jim's Creek project area, and the logging may

have resulted in damage to mycorrhizal systems, and a major loss of remaining standing trees due to blowdown. How will this project ensure the integrity of the forest and avoid the elements of the Jims Creek project that failed (i.e., blowdown, soil healthy loss, destruction of underground mycorrhizal systems)? We recommend retaining more medium and large trees than in the Jim's Creek project. This will serve several important purposes such as buffering the wind and reducing the risk of blowdown, mitigating the loss of snags and old growth impacts, retaining canopy that helps suppress the growth of surface and ladder fuels (and reduce slash production), and reducing carbon emissions.

Site-specific analysis is critical

This sale is extremely large in scope. How will site-specific considerations be taken into account and how will the Forest Service avoid overly generalizing when creating plans for this diverse forest? We recommend careful site-specific analysis and disclosure.

Spotted Owls and Red Tree Voles

We are very concerned with potential project effects to Northern Spotted Owl, and strongly encourage you to include owl effects as a significant issue in the EIS. At first blush, this project would seem to permanently degrade or remove a large amount of NSO habitat. We have heard rumor that RA32 habitat would not be included in timber sale units, which we would likely support as a smart and reasona

We are very concerned for potential project effects to red tree voles. Our starting place for analysis is that RTV sites ought to be found and protected, as called for in the NWFP. Anything other than that needs to clear a high bar. There would need to be both substantial and certain benefit to the proposed action, as well as very high certainty of adequate mitigation or protection of voles, before such a serious tradeoff would be responsible.

We take seriously the requirement under the NWFP that such NHP designations need to be part of the NEPA decision. Please apply the best available science, and take special care on this issue in the EIS. We also specifically request notice and opportunity for comment if a non-high priority process occurs.

Wildfire

Cascadia Wildlands is very excited to see the Forest Service looking forward in such a progressive way towards re-introducing wildfire onto the landscape. Please apply the best available science, frankly discuss uncertainties and controversies, and thoroughly evaluate the direct, indirect, and cumulative effects regarding project interplay with wildfire.

One of the more exciting, and risky, aspects of this project is the long-term potential, and long-term need, to allow low-intensity wildfires to burn on the landscape. Cascadia Wildlands is excited by that possibility and supportive of the effort, but critical questions do need to be asked.

- To what extent do forest restoration objectives require frequent fire to be successful? What are the consequences if fire does not return as supposed by theory, but is less (or more) frequent?
- How realistic is it to be able to allow natural (ie. Not prescribed burns) wildfires to burn on the landscape? Human use of the area has obviously changed quite a lot since 1850.
- What are the tradeoffs in terms of human health and safety, by shifting the landscape towards more frequent low-intensity burns?
    - Firefighter safety—which poses more risk to firefighters in terms of safety, frequent low-intensity burns, or less frequent high-intensity ones? Are we putting firefighters at greater risk by taking this action? Or by not taking it?
    - Smoke—more frequent low-intensity burns would seem to produce a lot more, and lot more frequent, smoke exposure. What effects would the project have on smoke exposure to people in the forest and nearby towns? Also, what effect might more smoke have on micro-climate?
- What significance climate change?
    - We were interested and alarmed to see the projection of an average 39 degree increase in temperature in the project area (Rigdon Landscape Analysis p.35). Please specifically apply and describe a similar sort of analysis for this project.
    - Our understanding is that studies show the more dangerous large wildfires are driven by climate (e.g. hot weather and wind), rather than by fuel loading. If that is the case, and those dangerous climate conditions are going to worsen far beyond historic patterns, then is restoration to high-frequency low-intensity burn patterns still the right approach? Is such restoration possible any more?

Aquatic Systems

Cascadia Wildlands is strongly supportive of proposed aquatic restoration activities. Also in light of the significant project effects to riparian systems as a result of upland harvest, impacts to the aquatic ecosystem and ESA-listed fish species should be a major, alternative-driving issue in the EIS.

The Youngs Rock Rigdon project area is host to a network of perennial, fish bearing streams and creeks that flow directly into the Middle Fork Willamette River. How will the Forest Service protect the integrity of fish-bearing waterways throughout the project area against the risk of erosion, sedimentation, higher water temperatures and lower stream flow? Will the Forest Service consider dropping logging in units with numerous waterways and especially steep grades? We recommend strong conservation of aquatic objectives in riparian reserves, including high canopy cover and high wood recruitment throughout the full width of the riparian reserves. This probably means using non-commercial restoration methods in riparian reserves with existing mature forests.

Forest Products

It is fine when restoration actions happen to result in a profitable timber sale, but we have some concern that the revenue-generating timber production rationales will swamp the restoration rationale. There is a large risk of bias infecting the restoration process too, where there are direct economic motives to generate commercial timber sales. The scoping notice says this project would provide a "sustainable supply" of 65 mmbf of timber. But, is it? The restoration rationale would seem to indicate this timber sale is a one-time event, and beyond that, that after the proposed action these stands would contain and produce a lot *less* timber volume than before. Open stands of oak and ponderosa pine are not sustained-yield timber volume generators (and timber production isn't a valid rationale on reserves), and even less so grassy meadows.

Recreation

The project area is regularly host to hikers, bikers, anglers and hunters who enjoy the myriad trails, waterways and resources the forest has to offer. How will recreation opportunities be safeguarded during and after project implementation?

Climate and Carbon

Given the many important ways that climate change projections interplay with this project, we encourage you to make carbon and climate a significant issue for the project.

One part of the picture are foreseeable and cumulative impacts with regard to climate change effects on forests and streams. Climate change is critically relevant to projecting forest succession, fire behavior, and project effectiveness.

Another part of the picture are ways this project can help or harm carbon storage potential of forests. Forests are among the largest stores of living carbon on the planet. The forests of the Pacific Northwest are globally significant for their ability to sequester carbon and keep it safely stored for centuries, but only if protected from industrial logging. How is the Forest Service protecting the carbon sequestering potential of this forests? We recommend a full and accurate quantitative analysis of carbon emissions versus storage of various alternatives, and the social cost of carbon emissions.

Thank you for considering these scoping comments. Please keep me informed as this project moves forward.

Sincerely,

Gabriel Scott
In-House Counsel
Cascadia Wildlands
POB 10455
Eugene, OR 97440
gscott@cascwild.org
(541) 434-1463