

On June 29th I visited several units with a group in the Young Rock Rigdon timber sale and recreated in the area. The areas I visited were native, 80-150 year old stands in units 9297 and 2584 near the Secret campground on the southwestern side of the sale. Inside unit 9297, we noticed that there is a steep grade from the road into the unit and a number of legacy trees up the south facing slope. At the top of the ridge, the forest opens up a great deal and ponderosa pines and sugar pines become more prominent on the landscape. In the midwestern section of unit 9297, there is an especially healthy stand of old ponderosa pine forest with legacy trees measuring over 50" in diameter (see photo 1).

In these areas where ponderosa is already clearly successfully competing with douglas fir, it seems unnecessary to disturb an old, well adapted forest in order to introduce more pine. If these areas are allowed to burn and experience natural disturbance in the future, it seems evident from the landscape that more pine will naturally return to the area. Disturbing these areas introduces a risk that mycorrhizal systems will suffer as in the case of the Jim's Creek project, where large trees remaining experienced blowdown and died because too many trees were taken. Such risks resulting from commercial logging in this healthy forest ought not be taken.

Toward the center of unit 9297 there is one perennial creek flowing and clearly providing habitat to local riparian-dependent species (see photos 2 & 3). Just west of that creek there is another heavily flowing established river (running north-south) in a steep gully (see photo 4). Neither of these areas are marked waterways on the scoping map, and both should be protected.

Alongside the ridge between the two water bodies there is a wildlife trail that is currently being used by elk and deer (see photo 5). We also witnessed evidence of bear in claw marks on the side of a large douglas fir tree.

In this area we found numerous 50" and greater ponderosa pine and some sugar pine at the northern of the unit (see photo 6). We also found a great deal of legacy doug fir and cedar trees (see photo 7). Generally the legacy tree count is 20 legacy trees per acre, with many legacy trees ranging from 50-65" diameter. This area is clearly full of wildlife, viable waterways, and old growth trees, and currently contains many fire- adapted pines (see typical stand structure in photo 8). If logging is to occur in this unit, it should be based on individual tree selection and not for commercial timber production.

At the northernmost part of unit 9297 we also saw a lot of blowdown (see photo 9), including a number of large fallen legacy trees. We noticed that the wind strength is much greater in the areas bordering the young tree plantations to the north and west of the unit, which make the trees there more vulnerable to blowdown. If logging occurs in this area, great care should also be made to protect root systems and leave enough trees to create protection from the strong winds known to occur in the area.

The logging road between Unit 9297 and unit 2584 creates steep grades on both sides. Unit 9297 is higher elevation, drier and contains more ponderosa and sugar pine than the lower unit. This area contains 20-30 legacy trees (30" diameter and more) per acre, with most being over 45" in diameter (see photo 10, typical stand structure). This area does also contain a number of younger 30-40" cedar and douglas fir trees which could be thinned to create space for pine, however the slope and exposure to wind due to the logging road to the south make anything but a very light thin seem risky and unnecessary.

This area was once a pine and oak dominant forest when humans were actively using fire on the landscape, and fire suppression has obviously allowed douglas fir to gain greater dominance.

However, there are arguments to be made for allowing the natural process of fire to do the work of thinning for us, rather than implementing a risky thin of a healthy and viable douglas fir forest in order to reinstate a bygone era of forest succession. If pine trees will be more successful on the landscape in an era of climate change, then a combination of fire occurrence (if intentionally burned or simply allowed to occur), blowdown, and natural competition could lead to the same result desired through this logging.

Finally, one thing that must be noted is the surrounding industrial tree plantations within the project area. These forests are not viable habitat and do not support healthy rivers or soil systems for future generations. If additional injury is caused within the healthy public lands within this project proposal, the cumulative impacts of such occurrences would be great due to the deteriorated plantations nearby.

Looking at the stands that I saw and receiving input from others who explored different stand throughout the sale, I would request that the Forest Service seriously consider a combination of controlled burning and individual selection if implementing a restoration project in this area. There does not seem to be an ecological need or basis for extracting commercial value from this forest. If an effort is to be made to improve forest health, diversity and climate resiliency, it should be done on the stand level and through individual selection, taking as little board feet as is possible to prevent injury to the stand and achieve desired outcomes.