

August 10, 2020

Submitted electronically via:

[https://cara.ecosystemmanagement.org/Public/CommentInput?project=53966;](https://cara.ecosystemmanagement.org/Public/CommentInput?project=53966)

Dave Warnac
District Ranger
Responsible Official
Willamette National Forest
57600 McKenzie Hwy
McKenzie Bridge, OR 97413

Forest Supervisor
Reviewing Officer
Willamette National Forest
Attention: Objections
3106 Pierce Parkway, Suite D
Springfield, Oregon 97477

DOCUMENT TITLE: Flat Country Project Objection

PROJECT DESCRIPTION: The Forest Service has a decision selecting Modified Alternative 2. From the Record of Decision: The Modified Alternative 2 would allow harvest on 4,438 acres in the project area. Harvest treatments would include thinning, gap creation, dominant tree release, regeneration harvest, and skips. Harvest treatments would occur in stands ranging in age from approximately 27-150 years old and yield approximately 102 million board feet of timber. Post-harvest fuel treatments include pile and burn and post-harvest underburn. Approximately 10.3 miles of temporary road construction would occur and approximately 130 miles of existing road would be maintained.

PROJECT LOCATION: Willamette National Forest, McKenzie River Ranger District

NAME AND TITLE OF RESPONSIBLE OFFICIAL:

Darren Cross
District Ranger
McKenzie River Ranger District
Willamette National Forest
57600 McKenzie Highway
McKenzie Bridge, OR 97413
541-822-7200

LEAD OBJECTOR: Cascadia Wildlands

Cascadia Wildlands and Oregon Wild request to meet to discuss potential resolution of this objection.

Re: OBJECTION- Flat Country Project

To the Objection Reviewing Officer

Cascadia Wildlands and Oregon Wild ("Objectors") respectfully submit these objections to the U.S. Forest Service's Draft Record of Decision ("DROD") and Final Environmental Impact Statement ("FEIS") for the Flat Country Project. In the DROD, Darren Cross, the Responsible Official, decided to implement a modified alternative 2. This alternative will treat approximately 4,438 acres in the project area in stands as old as 150 years old. This alternative also authorized the construction of 10.3 miles of temporary roads.

As required by 36 C.F.R. § 218.8(d), the lead objector's name, address, telephone number, and email address:

Nick Cady
Cascadia Wildlands
120 Shelton McMurphy Blvd. , Ste 240
Eugene, OR 97401
(541)-434-1463
nick@cascwild.org

1. Interest and participation of the objecting party.

Cascadia Wildlands is a non-profit corporation headquartered in Eugene, Oregon, with approximately 10,000 members and supporters throughout the United States. Cascadia Wildlands educates, agitates, and inspires a movement to protect and restore wild ecosystems in the Cascadia Bioregion, extending from Northern California up into Alaska. Cascadia Wildlands envisions vast old-growth forests, rivers full of salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia Bioregion. Cascadia Wildlands' members have enjoyed and will continue to enjoy the recreational opportunities provided within the area.

Oregon Wild is a non-profit corporation with approximately 20,000 members and supporters throughout the state of Oregon and the Pacific Northwest. Oregon Wild and its members are dedicated to protecting and restoring Oregon's wild lands, wildlife, and waters as an enduring legacy. Oregon Wild's staff and members regularly visit the Flat Country area and surrounding federal lands and seek to ensure that the Forest Service faithfully and fully implements and complies with federal law in managing the natural resources of the Project area as a means of protecting their interests. Oregon Wild's staff and members hike, bike, photograph scenery and wildlife, use, and engage in other vocational, scientific, and recreational activities in and around the Flat Country Project area. Oregon Wild's staff and members derive recreational, inspirational, scientific, and aesthetic benefit from their activities within the Flat Country Project area. Oregon Wild's staff and members intend to continue to use and enjoy the Flat Country Project area and surrounding forested lands, waters, and trails frequently and on an ongoing basis in the future.

2. Issues of the decision to which the objection applies.

Objectors believe the Forest Service's decision, including the Draft ROD and FEIS, violates numerous laws, regulations, and policies, including but not limited to:

- a. Articulates a flawed purpose and need statement.
- b. Failure to use the most recent and best available science.
- c. Failure to consider an adequate range of alternatives.
- d. The project fails to analyze project impacts to recreation.
- e. The scale of proposed road construction goes beyond the means necessary.
- f. The project fails to take a "hard look" at the indirect, direct, and cumulative impacts of the project.

OBJECTION POINTS (Supplement to Cascadia Wildlands 8/10/2020 Objection)

REGENERATION LOGGING, PLANTATION ESTABLISHMENT AND FIRE HAZARD

“Plantations are extremely flammable because of high crown to trunk ratio and because crowns are very close to the ground.”

-Upper South Fork Trinity River Happy Camp Creek Watershed Analysis, Shasta-Trinity National Forest at page 21.

“While the severity varied throughout the fire area, young timber plantations carried the fire while older stands tended to be more resistant. This is mostly due to young timber plantations having a high density of ground fuels.”

-BLM Douglas Complex Fire 9/5/13 Burned Area Emergency Rehabilitation Plan

Our organizations are extremely concerned that the proposed regeneration logging followed by the establishment of artificial plantations will increase future fire hazard in the Flat Country planning area. The practice of converting native forest stands into young tree plantations significantly increases fire hazard in the mid- to long-term. Tree plantations are more susceptible to intense fire behavior and severe fire effects than unlogged mature forests, including burned forests (DellaSala et al. 1995, Odion et al. 2004). The increased susceptibility of plantations to severe fire is due to:

- Structural characteristics, such as fine and interlocking branch structures situated low to the ground, which facilitate high heat energy output by fire and rapid fire spread (Sapsis and Brandow 1997).
- Warm, windy and dry microclimates compared to what would exist in an unlogged burned forest that possessed more structural diversity, ground shading and barriers to lateral wind movement (Countryman 1955, van Wagendonk 1996).
- Accumulations of large volumes of fine logging slash on the ground surface (Weatherspoon and Skinner 1995).

In addition to these direct and indirect effects on the fire environment, the cumulative effects of plantation establishment include the creation of more highly flammable even-aged stands on a landscape already vulnerable to uncharacteristically large and severe

fires. The number and distribution of even-age tree plantations resulting from industrial timber management has altered fire behavior and effects at both stand and landscape scales. (Frost and Sweeny 2000, Hann et al. 1997, Huff et al. 1995). Perry (1995) suggests that the existence of sufficient young tree patches on a forest landscape creates the potential for "a self-reinforcing cycle of catastrophic fires." Most plantations occur near roads (DellaSala and Frost 2001), which presents an added risk of human-caused ignitions during hot and dry conditions (USDA 2000).

Please note that the BLM BEAR Report for the Douglas Fire Complex acknowledged that "while the [fire] severity varied throughout the fire area, young timber plantations carried the fire while older stands tended to be more resistant. This is mostly due to young timber plantations having a high density of ground fuels."

Two fires in 2002 on the Umpqua National Forest were evaluated for their effect on the forest. Excerpts from the March 2003 Wildfire Effects Evaluation Project by the Umpqua N.F. are make clear the impact of creating more tree plantations:

"Plantations had a tendency to increase the rate of fire spread and increased the overall area of stand-replacement fire effects by spreading to neighboring stands." Page 4.

"Fire burned most plantations with high intensity and spread rapidly through the canopy of these young stands." Page 20.

"Plantation mortality is disproportionately high compared to the total area that plantations occupied within the fire perimeter." Page 26-27.

"Crown fire spreads readily through these young stands: rates of fire spread can be high, and significant areas or mortality can occur in and adjacent to these stands." Page 32.

Finally, the report concludes that the fire behavior in forest that had not been converted to tree farms was normal. "The pattern of mortality in the unmanaged forest resembles historic stand-replacement patch size and shape." Page 64.

We agree with the finding at page 98 of the Medford BLM Trail Creek Timber Sale EA indicating that:

A forest's resiliency to fire can be increased by managing surface fuels to limit the flame length, removing ladder fuels to keep flames from burning into tree crowns...and retaining larger diameter trees that are more fire resistant.

We have also attached the entitled "Flat Country Literature Attachments" which includes further studies and resources pertaining to the increase in fire hazard and wildfire dangers resulting from conducting regeneration harvest logging techniques including shelterwoods that convert mature forests into plantations.

A handwritten signature in black ink, appearing to read 'Nick Cady', with a stylized, flowing script.

Nick Cady, Cascadia Wildlands