

Blue Mountains Biodiversity Project Scoping Comments on the "Mill Creek Dry Forest Restoration Project"

To: Elysia Retzlaff, Environmental Coordinator, Ochoco National Forest
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Or to: <https://cara.ecosystem-management.org/Public//CommentInput?Project=58081>

From: Karen Coulter, Director, Blue Mountains Biodiversity Project



The Ochoco National Forest is proposing a commercial timber sale under the guise of “dry forest restoration” on about 23,015 acres adjacent to the Mill Creek Wilderness Area within a defined project area of about 36,485 acres that is mostly within the Mill Creek Wilderness Area, which is off-limits to logging. So this appears to be plans to manage over half the project area, since the Wilderness Area designation prohibits logging and roading, this would be managing much more than half of the area where logging is allowed. This is not justifiable as “restoration”, especially when the area has already been logged, roaded, and livestock-grazed to death already. Commercial logging and new road construction, whether labeled “temporary” or not, is not restoration. Even the Blue Mountain Forest Partners collaborative group on the Malheur National Forest agreed, with full timber industry participation, that it was not necessary to log more than half of a designated project area under a proposed timber sale. I was there at that meeting when that was decided by consensus. The Ochoco Forest Service is thus now more rapacious for timber exploitation than the timber industry and their scale and pace of logging is now completely unsustainable ecologically, socially, and economically. It’s well past time for the Forest Service to change course to implement ecologically sound restoration without tying it to more destructive timber sales, road construction, and/or continued livestock grazing past the point of no return.

All the verbiage used to try to justify a “business as usual” timber sale being called “dry forest restoration” is simply cut and pasted from many previous timber sales over at least two decades, without agency consideration of whether these past sales achieved Forest Service “desired conditions”, and if so, at what ecological costs. The Ochoco, like other eastern and central Oregon National Forests, is now far more biologically sterile, homogenous, and vulnerable to both insect outbreaks and fire than it was three decades ago—as a result of timber sales like this one.

More commercial-size logging would remove mature trees next in line to replace large trees lost to past logging, so lack of fire resilience would be maintained and fire intensity could be increased with created openings producing drier conditions with higher wind speeds through the stands and more flammable slash. Incremental removal of mature trees through commercial logging inevitably leads to the majority of remaining trees being in-growth of more flammable small young trees. Then the Forest Service uses the resulting condition of mostly small flammable trees as an excuse to commercially log mature trees yet again.

Why would more commercial logging (and continued livestock grazing and wildfire suppression) be expected to generate different results than perpetuating the existing condition? More of the same abusive management distortion of the ecosystem is not restoration.

There’s plenty of natural mixed conifer in this area, indicating variable topography, moister areas, and higher elevations. This is not uniformly dry Ponderosa pine-dominant forest. Mixed and high severity

wild fires also occurred, not just low severity fire. Based on current best available science, mixed and high severity fire was much more common historically than previously assumed. Looking at recent fire maps of fire intensity in eastern and central Oregon, most fires were a mosaic of low, middle, and high intensity fire, as well as skipped green areas. Mixed and high severity fire is not confined to mixed conifer forest either historically or currently. Fire of all levels of intensity serve beneficial functions for the ecosystem. Most native wildlife and plant species evolved with wild fire and are associated with or dependent on habitat niches created by fire.

Please mail a hard copy of the cited “National Cohesive Wildland Fire Management Strategy” developed by the U.S. Department of the Interior and the U.S. Department of Agriculture.

This account of Historical Range of Variability (HRV) history neglects to explain why there are Western larch, Douglas fir, and Grand fir seed sources and mature trees and big old growth fir stumps if this was all dry open forest. There is no consideration of variable topography, moisture regimes, and elevation and the need to retain different conditions across the landscape to preserve biodiversity.

What are the types, locations, and dates of evidence used for the assumed HRV in this project area? Clearly the Forest Service is responsible for logging off the Ponderosa pine and Western larch. What evidence supports the contention that there is more Douglas fir and Grand fir than there was historically in this area? We’ve field surveyed in this general area before, within the last 22 years. We also led a group hike into the Mill Creek Wilderness Area before it burned. There’s plenty of evidence of historic firs—especially Douglas fir—from residual old growth live firs, and large old growth fir snags, logs, and stumps throughout the Ochoco National Forest and likely within the Mill Creek project area.

This area has been logged in multiple timber sales already, yet the Forest Service never seems to be satisfied with achieving their “desired conditions” once their timber sale rotation returns to the same area already logged. The Forest Service seems to see their mission as to log, build more roads, and allow livestock grazing, and then attempt to repair the resulting damage with more of the same plus expensive active restoration. Contrary to the purpose and need stated for the Mill Creek timber sale “project”, planned management (commercial logging, road building, with likely continued livestock grazing) has all weakened forest resilience, not improved forest resilience. Also contrary to the stated purpose and need stated for the Mill Creek timber sale (aka “Project”) there is no evidence that all the past timber sales across the West have increased “resilience to insects, disease, fire, and drought” or reduced “the risk (sic) of uncharacteristic (sic) high severity fires.” Instead there’s lots of evidence of greater loss of resilience with each sale, with more insect epidemics and equally or more intense fires. There is also recent science finding never logged forest areas to be more resilient to disturbance, which aligns with our observations on the ground. “Business as usual” timber sales result in more homogenous conditions, based on our field surveying observations before and after timber sale implementation.

The Forest Service is also responsible for riparian damage from timber sale, road construction, and livestock grazing, as well as for dense, homogenous continuous pine plantations that the Forest Service had cleared and planted. Why should we trust the Forest Service to accomplish different results with the same misguided management plans repeated over decades? Sorry, but the same old Public Relations spiel repeated with every timber sale ad nauseum is not compelling at all. For example, the following PR from the scoping letter: “The proposed project is needed to restore characteristic (i.e. historic) dry forest vegetative conditions in the Mill Creek project area, thereby increasing resilience to insects, disease, fire, and drought; reducing the risk of uncharacteristic high severity fires; and enhancing and restoring RHCAs.” (Mill Creek scoping letter, p. 2) This could have been cut and pasted (or re-worded more concisely) from virtually any of the Forest Service timber sales proposed over the last two or three

decades in eastern or central Oregon. There's nothing site-specific to the project area about these unfounded claims. These statements also ignore the full range of current scientific understanding of the efficacy (or lack thereof) of the usual management methods for achieving these assumed results. This reflects a lack of professional integrity on the part of the Forest Service.

Based on statements of the Purpose and Need statement and the inconsistency of proposed actions such as more commercial logging and more road construction with the Purpose and Need's expressed desire to improve existing riparian conditions and the homogeneity of forest stands, we suggest adopting a different action alternative as follows: a proposed alternative that does not include any commercial-size logging or new road construction but does include active riparian restoration, small tree non-commercial thinning by hand up to 9" dbh--only in plantations and hardwood riparian habitat where needed, with prescribed burning only in the dry Ponderosa pine or juniper-dominant forest types, skipping moister mixed conifer habitat suitable for Pileated woodpecker, American marten, or other species dependent on denser habitat such as elk and Northern goshawk, to preserve habitat niches for a variety of wildlife species. See our comments below for further concerns regarding any management in particular Management Areas in the project area.

If the Forest Service wants to reduce fire "risk", they should do so adjacent to people's homes, not in the back country. If there are overly dense plantations and historic hardwood habitat, go ahead and do small tree non-commercial thinning up to 9" dbh only where really needed and do prescribed burning only in dry Ponderosa pine/juniper-dominant forest to address Forest Service mismanagement damages, along with active riparian restoration, but drop all the commercial mature tree logging and road building as obviously ecologically detrimental. There is a compelling, scientifically supported need for mature and large tree structure retention (including also mature and large snags and logs) to slow or reduce climate change effects and to provide for unlogged wildlife refugia habitat and migration corridors so species losing suitable habitat can survive extreme climate change.

Based on current science evidence, there's still a deficit in high severity fire on the landscape compared to historical conditions and increasing evidence of high severity fire actually increasing biodiversity. There's also current science finding that with the effects of extreme climate change, fires are not likely to be reduced in size or intensity by thinning of the forest. Drought conditions with low humidity and high temperatures and increased wind speeds from climate change—weather conditions, not "fuel" loading—are driving the intensity and fast expansion of major recent fires. The Forest Service is not disclosing these findings and the science supporting them in the scoping letter, which allows the agency to stubbornly persist in their flawed foundational assumptions used to determine proposed management actions.

Most conifer "encroachment" in riparian areas is only small trees less than 10 to 12" dbh, so no commercial thinning is needed. Wood in the floodplain is needed for roughness and mature trees are needed for pool formation and bank stability. We are strongly opposed to any commercial logging and tree removal within any part of the Riparian Habitat Conservation Areas (RHCAs).

The RHCA "no logging" buffer widths were established by sound science that has yet to be disputed. Commercial logging and tree removal are not "restoration" and cause many negative impacts to riparian area ecological functions. These negative impacts include the loss of ongoing future recruitment of large wood to form pools; streambank or hillside de-stabilization; excess fine sediment delivery to streams; removing shading that keeps water temperatures cool; and reducing moisture retention in the riparian zone from shading in the upland zone. Quite often there are slopes above streams in the outer zone of the RHCA. Removing tree shading and using heavy equipment on upper slopes would destabilize the slopes,

increase sedimentation of streams, and reduce the moisture retention in the immediate area, including the lower riparian zone.

Riparian restoration can and should be done without an associated timber sale. Logging would not deal with the ongoing problem of livestock over use and would increase active sediment delivery to streams from existing haul roads and new construction of roads within RHCAs. Logging creates unnatural strains in ecological functioning, including by removal of large wood recruitment for flood plain roughness and for pool formation. We are concerned that mature and large tree felling in the wood recruitment zone of the stream would deplete future natural wood recruitment over time. It would be better to use trees felled from outside the RHCA, such as hazard trees by roads. If trees within the RHCAs would be used to increase large wood within streams, there needs to be clarification as to limits to that tree felling that would retain all bank stability, retain all existing stream shading, retain sufficient large wood recruitment over time from the stream recruitment zone, and prevent sedimentation of the streams. Tree-tipping is preferable to tree felling in order to use root wads for sediment trapping and for creation of pools and a meandering channel. On the Malheur, the Forest Service has designated sale units for tree-tipping rather than tree felling in order to use those whole trees for increasing large wood in creeks. The same could be done from hazard tree felling even more easily, as hazard trees are usually right next to roads.

The Forest Service has not justified commercial logging within RHCA buffers. INFISH science is still sound. Reasons given for commercial logging within the upper/outer “vegetation zone” within the RHCA buffers are mostly typical rationales for logging elsewhere and are not necessary or desirable to restore riparian conditions. For instance, “to maintain and restore the historic distribution, diversity, and complexity of vegetation within RHCAs to protect their function and resiliency” (scoping letter, p. 3): logging is contrary to maintaining and restoring historic distribution, diversity and complexity of plants within RHCAs. Instead, commercial logging creates unnatural impacts as described above, and tends to reduce plant and tree diversity, and create substantial ground disturbance detrimental to plant diversity and complexity, leaving ruts and bare ground more susceptible to the introduction and dispersal of exotic invasive plants that often out-compete native plants.

Other stated reasons to commercially log within RHCA buffers include standard silvicultural rhetoric used to justify commercial logging which is not specific to riparian restoration and would likely reduce biodiversity within riparian areas that are otherwise centers of biodiversity. These standard silvicultural rationales are: *Retain and recruit large trees by reducing competition and increasing tree vigor (yet removing trees needed for bank stability, shading, and wood recruitment to streams); *Restore historic fire tolerant species compositions (which actually means reducing stream shading and moisture-associated tree species that are naturally found in moister riparian areas); and *Reduce the risk of high severity wildfire and loss of large trees to insects and disease (instead immediately removing mature trees that would otherwise grow into large trees and removing trees that would otherwise be recruited naturally for floodplain roughness or pool formation if they die due to wild fire or insects or disease.) The last two “specific vegetative objectives of these treatments” (sic) could be done with just non-commercial thinning of small trees (up to 9 to 10” dbh) by hand and/or with prescribed burning: *Increase the abundance and vigor of hardwoods, and *Restore meadow habitats that have become dense with encroaching conifer species. In fact, it’s standard Forest Service practice to restore riparian hardwoods and restore meadow habitats by using small diameter thinning by hand and/or by doing prescribed burning, out of respect for the need to protect vulnerable riparian habitats from the impacts of logging.

The Ochoco National Forest has a high degree of variation regarding topography, elevation, slope aspects, and moisture regimes. These create heterogenous conditions supporting different forest types, which cannot all be lumped together as simply “dry” forest. These heterogeneous conditions create

important habitat niches that support biodiversity, which should not be rendered virtually sterile by “one size fits all” blanket logging and burning “prescriptions”. The Forest Service fails to recognize the significance of Grand fir, Douglas fir, and multiple canopy layers continuing to return after logging in mixed conifer forest types, which indicates that these stands were historically mixed conifer. Legacy old growth Douglas fir and Grand fir (live, snags, logs, and big fir stumps) are evident across the Ochoco. Forest Service logging records no doubt also record the volume of mature and old growth fir removed by timber sales across the Ochoco in different areas. Loggers who once logged old growth Grand fir on the Ochoco have talked about that in Ochoco collaborative group meetings. I remember that specifically in discussions of the Wolf sale when the Forest Service planned to remove Grand fir over 21” dbh as “young” trees claimed to be “encroaching” on old growth Ponderosa pine, when an older logger present acknowledged logging a lot of old growth Grand fir out of that high elevation area when there was a spruce budworm epidemic. We witnessed a lot of big old growth fir stumps there, as well as legacy remnant big old growth Grand fir and Douglas fir. So in many cases the Forest Service is engaging in denial of factual evidence of historic abundant fir on the ground, a form of historical revisionism to justify more destructive logging.

The Forest Service has already aggressively pursued this same proposed “active management of dry forests” across the Blue Mountains forests, including the Ochoco, even where the original forest was multi-layered mixed conifer with old growth Douglas fir and Grand fir. This is glaringly obvious on the ground with many old growth fir stumps per acre in past sales such as Black Bear, Fryton, Deep/Jackson, and many others. In the Black Bear sale I counted an average of eleven old growth fir stumps per acre in addition to the live mature fir planned for logging in the sale units and residual old growth live fir. We ask the Forest Service to disclose and analyze the impacts from many such timber sales across the project area, the Lookout Mountain District, and the Ochoco National Forest as a whole, with detailed information on the overlap of this project area with past timber sales, including the McKay sale, and the effects of those sales, including the volume and size of fir species removed by logging. The Forest Service should also do an assessment of why the Forest Service is implementing such a short logging rotation after meeting their defined “desired conditions” for each of these timber sales. A 30 year (and less, now) timber sale rotation does not allow for much diameter growth in the remaining mature trees. The Forest Service is now logging repeatedly before stands reach full maturity, resulting in stands averaging only 10 to 11” dbh, when the timber industry usually waits to log until the average tree size is at least 16” dbh.

We are concerned by the significant cumulative negative impacts of such a short logging rotation with very large “landscape scale” timber sales, which has become forest liquidation, not forest restoration. This is an especially significant issue when we are facing extreme global warming that threatens the continuance of life on earth as we know it, contributing to the Sixth Mass Extinction of species and unraveling ecological functions critical to human survival, such as by threatening pollinators and causing extreme droughts and storms, and escalated fire intensity. The Forest Service is ignoring recent science drawing attention to the critical need to preserve forest carbon storage and sequestration by protecting mature and large tree forest cover from logging. Climatologist Dr. James Hansen has warned that stopping fossil fuel emissions and switching to renewable energy sources will not save us from extreme climate change effects unless we fully protect existing natural carbon sinks, including the oceans, forests, and soils. Commercial logging threatens the carbon sequestration of both trees and forest soils. Effects of this proposed timber sale to climate change must not be discounted, as many timber sales cumulatively add up to incremental deforestation. Climate change is caused by many incremental actions causing increased Greenhouse gas emissions that result in global warming. The Mill Creek timber sale is one of many timber sales across the region contributing to climate change and is part of an ominous pattern of an

ever-increasing scale and size of individual timber sales threatening the loss of most remaining mature trees and younger cohorts that would otherwise become mature and large trees.

The Mill Creek area can't withstand more commercial logging. There are also far too many roads and much ATV damage, so constructing and re-opening more so-called "temporary" roads will just exacerbate impacts to soils, riparian areas, and wildlife. Opening up the canopy to low basal areas to produce single story stands ignores the reality that younger stands need more trees to allow for natural mortality creating snags and logs needed by wildlife before they become more open old growth stands. Trying to force young stands with most old growth already lost to logging to mimic historic open dry forest old growth stands is inaccurate use of the science and does not really replicate historic conditions. Opening up younger stands to very low basal areas in moister mixed conifer forest also dries out the stand conditions, reducing water retention from shading and setting up hotter, drier conditions for more intense fires with greater wind speeds moving through the stands.

Therefore we ask the Forest Service not to log mature and large trees, including the largest cohort in younger stands—to drop the commercial logging. Likewise, there should be no commercial logging in RHCAs and no biomass removal from RHCAs. Drop prescribed burning in moister mixed conifer areas so as to protect suitable habitat for moister mixed conifer and denser forest-associated wildlife species, including the Management Indicator species Pileated woodpecker, American marten, and Rocky Mountain elk, as well as the focal species, Northern goshawk. Prescribed burning does not have the same effects as wild fire and can be especially damaging in areas that historically burned at mixed or high intensity or were skipped by past fires.

The Mill Creek timber sale proposal involves a lot more road re-opening and construction than needed road closures and decommissioning. More road construction and re-opening of closed roads would perpetuate the same predictable negative impacts to RHCAs; elk security and calving habitat; native plants, including invasive exotic plant introduction and dispersal; and increased access for ATVs, fur trapping, livestock, and illegal firewood cutting. This is not a trade-off for beneficial effects, but net long-term damage. Road closures have chronically not been enforced and "temporary" roads have not been decommissioned and are being planned for re-opening as "existing disturbance"—defacto system roads. This is contrary to past Forest Service promises that these roads would be only temporary (i.e. not used again) and would be fully decommissioned.

Drop all planned "temporary" road construction, including both new and existing disturbance "temporary" road construction. Enact road closure enforcement without using the ecologically damaging roads, roads that would require reconstruction, and overgrown roads for logging before closing them. Use effective barriers for closing roads, not just easily circumvented berms or post and pole barriers. Close and schedule for decommissioning all roads that are ecologically damaging; causing disturbance to wildlife, such as for migration corridors or calving and fawning areas; are overgrown; or are unnecessary or redundant. All roads within RHCAs should be decommissioned except main system roads with adequate paving or gravel and sufficiently large culverts.

Increase the mileage of road closures and decommissioning as restoration based on the criteria above. Eliminating road construction and commercial thinning increases funding available for ecologically sound restoration. The Forest Service heavily subsidizes timber sales. The Ochoco Forest Service should be applying for funding for ecologically sound riparian restoration and road decommissioning that is not linked to timber sales.

Regarding active riparian restoration: Clearly define what kinds of "floodplain manipulation" are being proposed, the methods, used, and the potential negative ecological effects. Don't construct roads or

landings within RHCAs and don't ignite fires within RHCAs. Any large wood felling into streams should not include trees ≥ 21 " dbh or be from trees that currently exist in the natural stream recruitment zone for wood recruitment over time.

The Ochoco National Forest Plan is badly outdated (since 1989!). The Forest Service needs to update their management plans to reflect current best available science regarding the need to retain carbon storage and sequestration in the face of extreme climate change and to fully protect wildlife dispersal, migration, and security corridors for foreseeable increased migration for species losing suitable lower elevation habitat to drought, high temperatures, and/or wild fires. The Forest Service also needs to incorporate other updated science regarding the futility and ineffectiveness of using commercial logging in the back country to reduce "risk" of fire or reduce the severity or extent of fire—especially in the advent of extreme climate change effects making fires almost impossible to control.

Strangely, there is no clear statement in the scoping letter that the Forest Service plans to meet Forest Plan requirements and follow Forest Plan guidance, or how they would do that with the current management planned. We support full adherence with the existing Forest Plan and are opposed to violations of the Forest Plan, including the Eastside Screens. We are strongly opposed to any logging of live trees or snags ≥ 21 " dbh and large down wood removal because of the scarcity of large live trees, large snags, and large logs due to past logging of large trees. Large wood structure is needed for wildlife habitat; erosion control; carbon storage; nutrient cycling in soils; and recreational natural aesthetic values.

Regarding Forest Plan management areas:

Drop commercial logging adjacent to the Mill Creek Wilderness Area. Mill Creek Wilderness Area needs intact unlogged forest buffers to maintain a natural setting and preserve solitude, as MA-F3 requires.

We support no further management in Developed Recreation areas.

Logging is contrary to the management area guidance for Stein's Pillar Recreation Area, which "is managed to maintain a scenic, natural or natural-appearing setting associated with unique geologic formations, particularly Stein's Pillar. This area provides opportunities for nonmotorized recreation, with various opportunities to enjoy nature." (Scoping letter, p. 6) Logging does not maintain a scenic, natural, or natural-appearing setting. Commercial logging degrades or destroys various opportunities to enjoy nature.

Winter range usually has scarce cover to begin with, and that forest cover is needed for thermal cover for elk and declining deer to survive harsh winters. There should be no more logging in winter range. Commercial logging in General Forest Winter Range is not "designed and implemented to recognize big game habitat needs" as the Forest Service has consistently ignored the need to retain thermal cover for elk and deer in all the designated winter range.

Visual corridors have been systematically hacked beyond recognition of "natural-appearing character" from many timber sales along major travel routes, down-grading tourist and recreational appeal. This needs to change to respect the intent of not having management activities evident or "visually subordinate" to the surrounding landscape. Commercial logging in these scenic corridors is not appropriate except for hazard trees.

Logging within RHCAs is not compatible with INFISH management goals as expressed in the Scoping letter, p.7: "INFISH provides direction to protect habitat and populations of resident native fish...INFISH established Riparian Management Objectives (RMO) and delineated Riparian Habitat

Conservation Areas (RHCAs) where riparian-dependent resources receive primary emphasis.” And: “These areas will be managed to maintain or restore water quality, stream channel integrity, channel processes, sediment regimes, instream flows, diversity and productivity of plant communities in riparian zones, and riparian and aquatic habitats to foster unique genetic fish stocks that evolved within the specific region.” (Scoping letter p. 7) Logging, heavy equipment use, road construction and use, and tree removal are well recognized to be detrimental to riparian ecosystems. This is why INFISH and PACFISH “no logging” buffers were established in the first place to protect habitat and populations of resident native fish.

Drop all commercial logging in: old growth (MA-F6); Summit Historic Trail Retention Corridor (which keeps getting logged in timber sales—MA-F7); Steins Pillar Recreation Area (MA-F17); Winter Range (MA-F20); and INFISH RHCAs—due to conflicts between commercial logging and reasons for these Management Area designations, such as “No Scheduled Harvest” for old growth (Mill Creek is a scheduled timber sale); “retention” for the Summit Historic Trail; elk thermal cover needed for winter range; and meeting Riparian Management Objectives for RHCAs, with riparian functioning being the priority.

It’s not clear from the scoping letter’s Table 2 how much of the proposed “treatment” acres in Old Growth; the Summit Historic Trail Retention Corridor; the Steins Pillar Recreation Area; Winter Range; and RHCAs, etc. would be commercially logged.

Following are some of our key concerns regarding potential logging impacts in the Mill Creek area that should be analyzed in depth in an Environmental Impact Statement for this timber sale “project”:

Effects to: Threatened-listed species such as Gray wolf and Canada lynx; Sensitive-designated species including Redband trout, Columbia Spotted frog, and Sensitive plants; Management Indicator species, including Pileated woodpecker, American marten, and Rocky Mountain elk; Focal species, including Great Gray owl and Northern goshawk; RHCAs and water quality; soil integrity and fertility; native biodiversity from homogenizing and opening the overstory of the forest; cumulative degradation of forest structure, soils, wildlife habitat, water quality, and biodiversity from repeated timber sales at increasing scales and accelerated timber sale rotations; and the cumulative severity and pace of climate change effects, including droughts; changed winter snowfall; more intense surface run-off; earlier Springs; wild fires; and loss of biodiversity—especially species needing cooler, moister micro-climate forest conditions.

Please keep us fully informed of all developments for this Mill Creek timber sale (“project”) by mail and/or phone at the address and message number listed above.

Thank you for consideration of our comments. For the Wild,



Karen L. Coulter

Karen Coulter, Director, Blue Mountains Biodiversity Project

