

Scoping Packet

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North Fork Crooked River Forest Resilience Project



To: Johanna Kovarik, District Ranger
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Blue Mountains Biodiversity Project comments
on the:

United States
Department of
Agriculture

Forest
Service

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Scoping Packet for the North Fork Crooked River Forest Resilience Project Paulina Ranger District, Ochoco National Forest

Crook County, Oregon



Thank you for considering our comments and for the good sale map
for our field surveying.

For the Wild, Karen Coulter

Our field survey sheets are part of our comments.

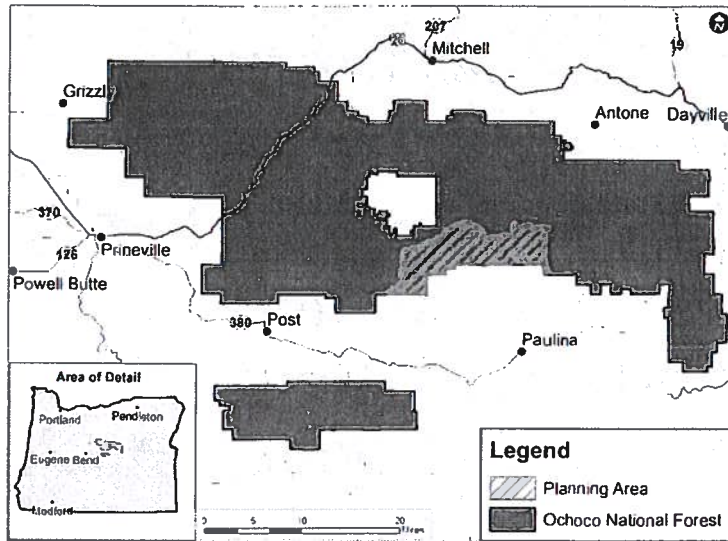


Figure 1. Project vicinity.

Features of the North Fork Crooked River Planning Area

The planning area is in the ancestral territories of the Confederated Tribes of Warm Springs, the Burns Paiute Tribe, The Confederated Tribes of the Umatilla Indian Reservation, and the Klamath Tribes. Dry forest types make up most of the forested vegetation. Ponderosa pine historically dominated these forest types, and frequent low intensity wildfire maintained open stands of large and old trees by removing small trees and underbrush though moderate or high intensity fire occasionally occurred. The area includes 8 miles of congressionally designated Wild and Scenic River on the North Fork Crooked River; this specific section is so designated because of its outstanding remarkable values of scenery and recreation and other significant river values of botany and fisheries. The scabland-stringer landscape common across the planning area provides a rich diversity of herbaceous vegetation, including rare endemic plants such as Peck's mariposa lily (*Calochortus longebarbatus* Var. *peckii*) in stringers and Henderson's needlegrass (*Achnatherum hendersonii*) in scablands. We also find large, old trees throughout, particularly of ponderosa pine.

Besides those features, the planning area offers other resource values typical of the Ocho National Forest:

- Habitat for diverse wildlife species including northern goshawk and other raptors, pileated and white-headed woodpeckers, various pollinator species, elk, and mule deer.
- Aquatic habitat for three Forest Service sensitive species—Columbia spotted frog, Inland Columbia Basin Redband Trout, and western ridged mussels.
- Forage for livestock grazing—The planning area includes portions of seven different cattle allotments.
- Potential for commercial timber harvest.

* Avoid logging and roading in RHCAs and habitat for Columbia Spotted frog, Redband trout, and Western Ridged mussels.

* Please drop any planned logging and most non-commercial thinning in Northern goshawk Post-Fledging areas and nest stands. Goshawks evolved to inhabit denser forest and need sufficient mature tree density to avoid competition for prey from raptors and owls that use openings. Use the Greenwald et al. literature review, not just Reynolds, which ignores habitat needs.

* Stop planning to commercially log stringer forest, which generally follows drainages and ridges, as with the Black Mountain Sale, which we opposed re: such commercial logging of riparian areas and the only security habitat available for elk and deer. Focusing on the forest stringers for commercial logging ignores the critical forest habitat provided by the stringers in an otherwise open landscape of lithosol habitat, derogatively called "scabland" by the Forest Service.

* Buffer and protect from heavy equipment use (logging, roading) all known population of Peck's mariposa lily, which has been systematically reduced.

* Maintain denser moister mixed conifer habitat without logging for Pileated woodpecker.

* seven cattle allotments in the planning area represents a landscape scale degradation of riparian areas.

* We are strongly opposed to the Region 6 amendment to the Eastside Screens allowing for renewed large tree logging under a voluntary guideline only and a 30" dbh definition for "large" Grand fir. The Region 6 amendment is not based on any sound science or rationale, and will be challenged in court. We ask you to do the right thing.

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- Diverse semi-primitive and dispersed recreation opportunities.

Purpose and Need: Why are management actions needed? by using the 21" dbh Eastside Screens logging limit for this sale. Otherwise the timber sale would be contrary to the stated purpose and need of maintaining large trees for wildlife habitat and carbon sequestration and storage and would increase the ongoing deficit in large tree structure compared to historical conditions.

We developed this project based on management direction in the Ochoco Land and Resource Management Plan (Forest Plan), as amended (see Planning and Management Direction), and best available science. Best available science included the peer-reviewed climate change vulnerability assessment, *Climate Change Vulnerability and Adaptation in South-Central Oregon*¹, which examined how climate change will impact various resources in the Ochoco National Forest and other areas in South-Central Oregon and identified adaptation actions.

* Logging does not improve "forest health." The main project purpose is to improve forest resilience of this planning area to disturbance events, such as insect and disease outbreaks and wildfire, and to promote adaptation to climate change. While landscapes in this planning area evolved with disturbance events, current forest conditions shaped by past land management practices and exacerbated by a warming climate result in increased risk of uncharacteristic disturbance. For example, forested stands in this planning area have increased risk of high or moderate intensity wildfire where they historically would have experienced mainly low intensity wildfire because tree density and fuel loading are higher than historical levels. Warmer temperatures resulting from climate change may drive lower fuel moistures which may increase frequency and extent of wildfires (Halofsky et al. 2019). These factors also increase stress and consequently reduce resilience to large and old trees.

In reducing risk of disturbance events, we would be promoting and maintaining large, old trees and related values connected with wildlife habitat throughout the planning area and scenic values in specific areas of the Wild and Scenic River Corridor. We also would be reducing risk of wildfire spread from Forest lands to neighboring private and Bureau of Land Management lands south of the planning area.

Additional project purposes include providing wood products to the public, providing secure areas for big game (like elk and mule deer), addressing travel management issues, improving or maintaining riparian habitat conservation areas, and enhancing habitat for Peck's mariposa lily and other special plant habitats.

* Stay out of the N. Fork Crooked River scenic & wild corridor. There is need to improve forest resilience (i.e., so forests can better withstand disturbance events) by decreasing tree density, maintaining ponderosa pine, creating open stand conditions where lacking, and reducing hazardous fuels. The need to improve forest health connects to the need to also improve habitat conditions for riparian areas and Peck's mariposa lily. There is also need to improve habitat security for big game by reducing motor vehicle traffic through high-value habitat patches.

* Don't log to very low basal areas such as 40-60 baf. Large tree logging is planned. Since this does not allow for natural development of snags and logs over time at historical levels, or for a mosaic of density & openings.

Why manage this area now?

The Ochoco Forest Plan and best available science shaped desired conditions for this planning area. Existing conditions for several resource values are departed from desired conditions. Past land management activities that included fire suppression, logging that removed large trees, heavy livestock grazing, and road construction largely account for the gaps between existing and desired conditions.

Logging mature and large trees does not decrease insect and disease outbreaks or wildfire, but exacerbates their negative effects by artificially creating homogenous, even-age, single or few tree species plantations and by disrupting underground mycelium networks facilitating inter-tree carbon and nutrient sharing (see Suzanne Simard's research since 1997) and by removing mature and large trees more resistant to fire.

¹ Halofsky, Jessica E.; Peterson, David L.; Ho, Joanne J., eds. 2019. Climate change vulnerability and adaptation in south-central Oregon. Gen. Tech. Rep. PNW-GTR-974. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 473 p.

* The Forest Service needs to abandon its outdated assumptions (or propaganda) characterizing natural disturbances as "risk of loss" and commercial logging as "restoration," North Fork Crooked River Forest Resilience Project

when it is primarily responsible for existing degraded conditions. More of the same types of management does not "create landscape continuity of more resilient forests" but landscape scale degradation of forests, with loss of resiliency through logging and associated

"Cascading Impacts" to the forest result primarily from continued Forest Service mis-management, compounding past mistakes, with failure to assess root causes of these impacts and to use adaptive management.

Cascading impacts from high tree density roading impacts, with continued fire suppression and livestock overgrazing. Tree densities exceed historical densities which results in a closed canopy structure with multiple canopy layers. Multiple canopy layers result in increased ladder fuels. Some areas also have juniper encroachment. These factors increase acres at risk of loss to disturbance by insect, disease, or wildfire and result in an imbalance of habitat types for different wildlife species. * High stand densities are not the primary cause of poor riparian conditions, but a public relations propaganda. High stand densities contribute to poor or functioning at risk riparian conditions because overstocked conifers reduce sunlight and water resources for riparian hardwoods and aspen, grasses, sedges, and forbs, including Peck's mariposa lily. Riparian areas associated with perennial streams lack large wood and deep-rooted riparian shrubs and hardwoods and fail to provide quality habitat for aquatic species like inland Columbia Basin Redband Trout and calving and fawning habitat for elk and mule deer. Riparian areas of intermittent streams typically do not have sufficient water to support abundant amounts of native grasses and forbs. aspen. * The Forest Service needs to address the management causes of these poor riparian conditions, not repeat them with commercial logging in RHCA's.

The increased risk of losing large and old conifers to insect and disease or wildfire would in turn negatively impact wildlife species that depend on such trees and impact the scenic quality of some areas of the Wild and Scenic River Corridor. Scablands in some areas also have been encroached by juniper which reduces water and sunlight availability for browse and forage for wildlife and livestock. Areas, and road construction and use within RHCA's, including re-opening of closed Roads decrease big game security roads within RHCA's, "temporary" road construction within RHCA's, The spatial arrangement of open roads and "functionally open" closed roads creates a lack of habitat security for big game. This is a main contributor to decreased use of the planning area by big game species compared to historical levels. skidding across ephemeral draws, stream crossings by heavy machinery for logging, etc. None of these management actions should be used, as they degrade riparian conditions, including log hauling on roads within RHCA's, re excess fine sediment deposition in streams.

Climate change heavy machinery for logging, etc. None of these management actions should be used, as they degrade riparian conditions, including log hauling on roads within RHCA's, re excess fine sediment deposition in streams. Climate change may exacerbate departed conditions in the planning area. The projected temperature increase for the vicinity is 1.3 to 4.0°C by 2050 (Halofsky et al. 2019). Dry forest types are less sensitive to warming than other forest types because they may be able to migrate into more suitable habitat over long periods of time (e.g., higher elevation, and at Forest-wide or regional scale vs project scale). However, warming will likely contribute to an increase in frequency and extent of wildfires, and dry forests may experience widespread mortality because of compounding stresses (e.g., drought) (Halofsky et al. 2019). Increased biomass buildup from invasive annual grasses like cheatgrass, medusahead, and ventenata could promote spread of wildfire in the future (Halofsky et al. 2019); this could have particular significance in this planning area where such grasses create a continuous fuel bed across scablands which once served as natural fuel breaks between forested stands.

Climate change may also contribute to declining snowpacks, lower summer stream flows, and warmer water temperatures. This would reduce habitat quality for Columbia spotted frog, Inland Columbia Basin Redband Trout, and western ridged mussels (Halofsky et al. 2019). Scientists predict climate change may become large and old trees. The Forest Service is still systematically increasing the deficit in large and old trees by removing mature forest cover through commercial logging. The forests evolved with insects, disease, and wildfire as natural disturbance agents, not with commercial logging removal of forest structure for habitat or with roading livestock grazing and prescribed fire as currently practiced.

* Why are you using only one study for your discussion of climate change? The scoping packet carefully fails to disclose recent science stressing the

Scoping Packet need to retain carbon North Fork Crooked River Forest Resilience Project sequestration and carbon storage in forests by not logging mature and large trees. Without the also increase frequency and intensity of flooding because of increases of peak stream discharge and rain-on-snow events (Halofsky et al. 2019).

forest cover (including mature and large trees) being retained and protected from Specific adaptation actions to climate change included in this proposed action are: logging removal, climate

* Most forest density is only small trees up to about 9" dbh. Greatly scale down planned commercial logging except in over-planted plantations and increase the use of small diameter non-commercial thinning up to 9" dbh and prescribed fire in Ponderosa pine-dominant dry forest.

- Use commercial and noncommercial thinning to reduce overall stand densities to improve forest health and resilience to disturbance. Loss of the forest carbon sink.
- Manage fuels to reduce fire intensity which in turn may reduce erosion that degrades aquatic systems. * Drop all planned commercial logging within RHCA's, which ignores the well-documented impacts of this practice and the sound science supporting
- Improve riparian vegetation by using commercial and noncommercial thinning to release riparian vegetation from competition with conifers. INFTSH and PACFISH
- Improving riparian vegetation to increase or maintain streambank stability. RHCA buffers. We are strongly
- While both riparian hardwoods and conifers provide stream shading, many riparian hardwoods resprout after wildfire, providing stream shading again more quickly following a wildfire event. restoration
- Fell trees to create floodplain/stream roughness which will decrease impacts of flooding. must include not repeating root causes of riparian degradation, including
- Protect springs, seeps, and wetlands from negative project impacts with resource protection measures. opposed to any commercial logging within RHCA's. Riparian
- Conserve or enhance key wildlife resources and habitats that are underrepresented in the planning area (i.e., promote open forested stand conditions). restoration
- Use road system changes to decrease wildlife disturbance from human interactions. riparian degradation, including
- Decommission specific road segments to decrease road impacts to streams and riparian habitat conservation areas. Keeping livestock out of RHCA's and not logging in RHCA's.

These activities also align with focus areas (see below) and suggested activities for responding to shifting wildfire regimes and intensifying disturbances identified in the Forest Service's Climate Adaptation Plan, which was released in July 2022. * Please send me a hard copy of the FS 2022 Climate Adaptation Plan by mail.

Proposed Action: What management actions are

proposed where? * We support careful, ecologically sound "restoration" in riparian areas, including felling small trees (up to only 15" dbh) to increase Vegetation Management floodplain roughness, and planting of native local

Table 1 summarizes proposed vegetation management activities, and Map 1 in Appendix B shows riparian hard-locations of these activities. woods in openings where streams historically would have

Table 1. Acres of proposed vegetation management activities. had riparian hardwoods (e.g. in meadow, systems, not headwater streams).

Activity	Acres
Commercial thinning, noncommercial thinning, and prescribed fire	4,787
Noncommercial thinning and prescribed fire	4,979
Prescribed fire only	89
Total thinning	9,766

* Closing roads is not enough to restore good elk and deer cover

habitat and retain security habitat, protective screening from predators (especially human hunters), and thermal cover for protection from heat waves and severe winter storms, which will only increase under climate change. Natural forage openings are important, but not at overall loss of sufficient hiding and thermal cover.

* scale down the commercial logging to only over-planted pine plantations that have density up to 15" dbh that is likely to result in increased water and nutrient stress for the stand as a whole.

Repeated page

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Proposed Action: What management actions are proposed where?

We support careful, ecologically sound "restoration" in riparian areas, including felling small trees (up to only 15" dbh) to increase vegetation floodplain roughness, and planting of native local riparian hardwoods in openings where streams historically would have, had riparian hardwoods (e.g. in meadow systems, not headwater streams).

Table 1 summarizes proposed vegetation management activities, and Map 1 in Appendix B shows riparian hard-wood locations of these activities.

Table 1. Acres of proposed vegetation management activities.

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habitat and retain security habitat, protective screening from predators (especially human hunters), and thermal cover for protection from heat waves and severe winter storms, which will only increase under climate change. Natural forage openings are important, but not at overall loss of sufficient hiding and thermal cover.

* Reconsider the assumed "need" to do "vegetation management."
The agency is looking for problems by which to rationalize commercial

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Logging in whichever sale area is next on the logging rotation, even though the timber

Total prescribed fire

9,855

sale rotation is far too fast at ≤ 30 years to warrant further intervention.

* Riparian areas are naturally moister and more productive (i.e. denser) and should not be commercially logged.

Focus Areas for Vegetation Management and the logging/roading intervention
Commercial thinning and/or noncommercial thinning followed by prescribed fire are our most viable tools to do vegetation management at a landscape scale. To prioritize where we do these activities, we looked at the layout of forested stands (organized into "units") in relation to multiple factors, including (but not limited to):

- * The agency fails to disclose that Mt. Mahogany does forest ecological
- Riparian habitat conservation areas (see Inland Native Fish Strategy in Appendix A) and special plant habitats (e.g., Peck's mariposa lily, aspen and other riparian hardwoods, mountain mahogany) functioning
- Available access with existing roads best and dry rocky areas, not within conifers, and won't last long setting the stage
- Potential temporary road locations (an expected activity with commercial thinning) for the next repeated
- Forest Plan management areas in conifer forest. Mt. Mahogany management mistakes. The forest
- Known weed infestations is also very vulnerable Can thin itself, which is why
- Wildlife considerations to fire, including planned natural disturbances should be
- Areas showing comparatively higher fire risk because of high forested stand density prescribed fire. Mt. Mahogany "restoration is just another excuse to log. allowed to function. This pattern
- Areas near the Forest boundary or private lands of behavior is not adaptive

We then identified units where we can apply thinning and prescribed fire activities across the landscape in a relatively contiguous fashion and where we can accomplish multiple resource objectives through such activities. Related to feasibility and efficiency, we considered, steep slopes, stand density and tree size, but non

* Drop all steep slope logging, both because of soil and adaptive management
"Focus" areas for thinning and prescribed fire activities occur in two broad areas. The focus area in the eastern half of the planning area includes much of the Roba Creek subwatershed. Resource objectives Landscape =

specific to the east focus area are: creek impacts and since they are usually uneconomical to scale degradation needs to be abandoned

- Reduce risk of insect and disease outbreaks. log sawnway.
- Reduce fuel loading and decrease wildfire risk to moderate-risk areas near the Forest boundary and private property. NCTing and prescribed fire should be sufficient to reduce the extent
- Provide economic opportunity through commercial harvest. of insect and disease outbreaks
- Improve ponderosa pine resilience. and wildfire, since most excessive tree density is only
- Improve special plant habitats (Peck's mariposa lily, aspen and other riparian hardwoods, upland small trees, hardwoods like mountain mahogany). generally only up to 9-10" dbh due to past logging
- Acquire desired vegetation characteristics in riparian habitat conservation areas, such as increased and fire cover of riparian hardwoods and sedges, to assist in directly or indirectly attaining resource suppression.

- Improve resource availability (i.e., sunlight and water) for desired riparian vegetation and increase large woody debris in riparian habitat conservation areas. does not rely on commercial logging.

The FS already has a road network that exceeds the mileage extent of the National highway system, and can't afford to keep it all maintained.

* Don't reduce topographical and elevational tree species biodiversity and associated wildlife biodiversity by only selecting for Ponderosa pine. (* "large" defined as ≥ 21 " dbh)
* Don't log "large trees" in aspen stands, Mt. Mahogany, Peck's mariposa lily habitat or elsewhere, as large tree structure is still at a great deficit, see David Mildrexler's study.

* Trees need to be allowed to grow large to increase large woody debris in streams and support wildlife habitat needs for large tree-associated species.

* This requires letting more mature trees to grow by not logging them and not logging any large trees $\geq 21"$ dbh and far fewer at $\geq 15"$ dbh

* Let natural disturbances function in the back country, which includes letting wild fires burn in wild and scenic river corridors.
* Don't use prescribed fire in moister mixed conifer at higher elevations, on ash soils, and within RHCAs. Prescribed fire greatly degrades potential and active marten and Pileated woodpecker habitat.

The west focus area includes areas west of the North Fork Crooked River, portions just east of the North Fork Crooked River and acres in the Wild and Scenic River Corridor. Resource objectives for the west focus area are the same as those for the east focus area but also include:

- Promote the outstanding remarkable scenic value of the North Fork Crooked River where vegetation management is feasible by:
 - * We are strongly opposed to reduction of so-called "hazardous fuels"
 - * Reducing hazardous fuels in and near the Wild and Scenic River Corridor, within the Wild and Scenic River corridor, which should
 - * Improving ponderosa pine resilience, and
 - * Improving resource availability for select riparian habitat conservation areas along the North Fork Crooked River. remain unlogged and unmanaged so as to remain wild and scenic.
- Reduce risk of wildfire to Old Growth Management Areas by managing nearby forested stands. * Wild fire intensity can be reduced by NCTing and prescribed burning near

Thinning Activities (9,766 acres)

- We would follow commercial thinning with noncommercial thinning, and then we would underburn all thinned areas (i.e., use prescribed fire). We would pile and burn slash and other fuels where they occur in quantities that may cause undesirable fires effects with prescribed fire or wildfire. these special management areas.
- * The Forest Service persists in emphasizing "fuel" reduction (biomass) even though it is well established that low humidity, high ambient air temperatures, and high winds are the main drivers of intense wildfires.
- Thinning about 4,787 acres of merchantable timber will contribute to economic opportunity (commercial thinning).
 - Thinning about 974 acres in riparian habitat conservation areas will help acquire desired vegetation characteristics; about 200 acres of this will be commercially thinned and the remaining acres will be noncommercially thinned. * Drop the 200 acres of commercial logging in RHCAs.
 - Thinning about 251 acres will improve habitat conditions for special plant habitats (e.g., aspens, Greatly reduce Peck's mariposa lily, other riparian/upland hardwood species). the scale of NCTing in RHCAs. Use
 - Thinning about 469 acres inside the Wild and Scenic River Corridor and about 1,300 acres in forested areas outside but near the river corridor will maintain or enhance scenic quality of the river corridor by a) reducing risk of insect and disease outbreak and uncharacteristic wildfire, and b) prescribed fire (where applicable) instead of commercial logging for theoretical improvement of habitat for Peck's mariposa lily, riparian hardwoods, aspen stands, and Mt. Mahogany.

Thinning descriptions We will thin from below (i.e., leaving healthier trees), varying spacing to ensure the healthiest, most dominant trees are retained. We would favor (leave) ponderosa pine over Douglas-fir, grand fir, and juniper. * Drop all 469 acres of planned "thinning" within the Wild and Scenic River Corridor - i.e. drop commercial logging & NCTing. Thinning would remove trees by selecting the smallest, least healthy trees first, and then competing trees within larger size classes may be removed. Ponderosa pine, Douglas-fir, and western larch larger than 21-inch dbh and grand fir larger than 30-inch dbh will usually not be cut to maintain or promote late and old structural forest. * Don't log any trees of any species $\geq 21"$ dbh. * Stop eradication

Commercial thinning. We use commercial thinning to remove trees of merchantable size via timber sales with the goals to reduce tree density (i.e., stocking), maintain or improve tree growth, maintain or enhance forest health, influence species composition, and provide economic opportunity. Grand fir, which is a valuable tree species for wildlife habitat and drought survival through water retention in the roots when it is defoliated. This is in Pacific NW Research science

* The Forest Service has failed to incorporate more updated science to guide its forest management and repeats its mistakes - now on a landscape scale, on a faster, unsustainable rotation, and at greater logging intensity to very low basal areas. stop targetting density no matter where it exists. Logging does not improve or enhance "forest health." This is forest liquidation.

- * We request a firm diameter limit for non-commercial thinning of 9" dbh.
 * We also request consideration of an action alternative with any commercial logging → Scoping Packet Limited to $\leq 15"$ dbh, North Fork Crooked River Forest Resilience Project
 with no logging of large trees $\geq 21"$ dbh. This sale area has already lost most mature

* Having started to field survey the proposed commercial sale unit, we see a widespread need for small tree non-commercial thinning and prescribed burning, but not for commercial logging. See our sample survey sheets with these comments. We will send you more of our field survey sheets before the end of the scoping comment period.

Noncommercial thinning. We use noncommercial thinning to thin trees that are smaller than and large merchantable size, usually less than 9-inch dbh to reduce density in the understory to decrease risk of insect and disease attacks, reduce numbers of infected trees, and decrease risk of catastrophic wildfire by removing ladder fuels. This type of thinning is also used to fell trees into streams to meet riparian resource management objectives, remove trees encroaching on large trees (radial thin), enhance hardwoods, remove juniper, and restore historic species composition. We use noncommercial thinning in all commercial units following the commercial thinning by using either hand methods (e.g., chainsaw) or heavy equipment such as a masticator. We may use a feller-buncher to cut and precisely place wood (e.g., in a stream). With noncommercial thinning, cut trees are not sold.

Prescribed Fire (9,854 acres)

We propose prescribed fire as a follow-up activity behind the 9,611 acres of thinning to decrease fuel loading in forested areas. We would accomplish prescribed burning by grapple piling or hand piling 60 to 70% of residual fuels (i.e., slash) in all thinned areas then igniting those piles during conditions that hinder fire spread beyond piles. We will use grapple piling over hand piling where grapple piling is the more effective tool in relation to amounts of residual fuels, slope, soil types, road access, and resource protection measures to minimize unwanted impacts. We will usually hand pile noncommercial units that have no road access except for where residual fuels may be of such high quantities that we would create a temporary road to effectively pile slash by grapple piling. In following years after thinning, we would use "burn blocks" to efficiently underburn thinned areas using existing roads and other natural features to form control lines. This would minimize our need to dig fire line (which contributes to ground disturbance and potential negative effects). We propose about 345 additional acres for underburning only with no thinning.

Incidental Burning of Scablands Unforested scablands dissect forested stands throughout the planning area and potentially create a challenge to efficiently burning forested stands after thinning. We do not intend to use prescribed fire in scablands in between thinned stringers; however, digging fire line around every scabland to exclude any possibility of prescribed fire from creeping from thinned forested stands into scablands would cause an unnecessary amount of ground disturbance and would not be feasible.

Scablands were historically fire-evolved and fire-resilient: The sparse vegetation of scablands mainly consists of several small-statured sagebrush species and widely spaced bunchgrasses and wildflowers that historically served to break up fuel continuity and caused wildfires to "skip around" scablands in all but the most extreme fire conditions. With attention to both timing of prescribed fire to forested stands (typically in the spring or fall, with mild conditions, i.e., not hot or windy) and vegetation present in the adjacent scablands (i.e., consider presence of invasive annual grasses), we can allow scablands to serve as "natural fuel breaks" when we use underburning to manage fuels of thinned forested stands. Subsequently we would allow incidental burning to occur in scablands. We define incidental burning in this instance as prescribed fire that creeps into scablands from underburning of adjacent forested stands (after thinning) or from grapple or hand piles that are burned through active ignition.

We have used this approach to burn forested stands of scabland-stringers in the Upper Beaver Creek project area (east of this planning area). Using the same approach in this planning area, we would expect to see some incidental fire in scablands.

We would use resource protection measures to minimize risk of negative effects of piling and prescribed fire to scablands, "leave trees", riparian habitat conservation areas, and other resource values.

* Drop grapple piling. These bigger piles of slash create bigger sources of very flammable material which remains through subsequent fire seasons. So

much slash piling and big burn piles increase the intensity of any wildfire in the area. Grapple piling also causes more soil impacts.

Grapple and hand piling. We would build grapple piles 6 to 10 feet high and 10 to 15 ft across using an excavator. The excavator makes only single passes into thinned areas and travels on top of existing residual fuels to minimize disturbance. We would build hand piles by manually stacking residual fuels to be about 6 to 8 ft high and 6 ft across. We would burn piles after they have cured (in 1 to 2 years) and when weather and fuel conditions are conducive no unwanted fire spread. We would use lop and scatter (i.e., no piling) only where residual fuels occur in low quantities or a resource protection measure restricts grapple or hand piling.

Underburning. We would use underburning to reduce remaining surface fuels after thinning where we expect surrounding trees/remaining trees to now be able to withstand low intensity fire without undesired tree mortality or damage. We would apply fire under mild to moderate weather and fuel conditions to achieve desired fire effects by using aerial delivery (e.g., unmanned aircraft systems, helicopters) and/or ground delivery (e.g., with drip torches). * Don't use "aerial delivery" for under-burns. A lot of the proposed sale units still have not regenerated from the last round of logging with barren skid trails and logged openings. Aerial ignition is like war against the forest. As ignition from the air is more likely to cause crown fires.

Travel Management The goal of Ochoco National Forest is to provide a road system that is safe, affordable, minimizes ecological impacts, and meets immediate and long-term public and resource management needs. Therefore, we include road and trail system considerations in project-level planning by maintaining, creating, rerouting, closing, decommissioning, or changing assigned maintenance level of roads and trails to meet management and restoration needs, improve forest and stream conditions, increase functional wildlife habitat, eliminate redundant roads, and establish an economically sustainable transportation system. * The Ochoco Natl Forest has a history of not effectively closing roads. reminiscent of the Vietnam war. Ignition is done more carefully.

Rocks, berms, and signs are usually violated - especially by ATV riders. Big boulders work better than berms but strong metal gates that lock or full decommissioning should be prioritized. We considered road impacts to botany, fisheries, heritage, hydrology, and wildlife as well as access needs for the public, range management, project work, administrative work, and fire suppression, and we propose the road system changes shown below in Table 2. We would continue to "store" closed roads in our roads system database for potential future use, e.g., to use for potential future projects. Access of some of these closed roads will still be authorized for Forest Service administration (e.g., maintenance of range improvements), project-level or on-going work (e.g., invasive plant treatments), and emergency access (e.g., fire suppression). We would close roads by various means, including but not limited to gates, rocks, berms, or signs. * We want more closed roads to be fully decommissioned, not "stored" for future timber sales. There is no future for commercial logging on these forests, which have already degraded from about a century of over-logging, roading, and livestock grazing. Fully decommission all closed roads that are not maintained for administrative use.

Decommissioning "a road means we would completely remove it from our road system. On the ground, we would potentially remove the road prism from the landscape and/or restore segments of up to about three miles of closed roads specifically where such work (which requires ground disturbance) would accomplish an objective for aquatics and hydrology (e.g., restore hydrologic connection at road crossings). Decommissioning for transportation or botany resource benefit would potentially require ground disturbance only where the entrance to the road needs to be blocked to prevent vehicle use.

We propose building of no new system roads.

Table 2. Approximate miles of proposed road changes by primary resource objective.

Change type	Miles	Main resource benefit/rationale
No change (open roads)	58.3	Provide motorized access.
No change (closed roads)	39.0	These closed roads will remain closed to motorized use but stored in the Forest Service roads system database for potential future use.

* Prioritize fully decommissioning closed roads within RHCA and on steep slopes.

** Drop all planned commercial logging and heavy equipment use in any stream Category RHCA buffer. There is plenty of evidence on the ground and in the science that documents the destruction caused to riparian zones, ecological riparian functions, and aquatic and riparian-associated fish, amphibians, plants, and other riparian species.*

Scoping Packet

North Fork Crooked River Forest Resilience Project

Resource Protection Measures

We will include resource protection measures in the project to reduce or eliminate potential negative impacts or promote desired outcomes to various resource areas such as aquatics and hydrology, botany, invasive plants, scenic values, wildlife, and others. *Logging in RHCA's is planned ecological destruction of riparian areas and riparian-associated plants and wildlife.*

We are supportive of non-commercial thinning in dry, dense small tree thickets along intermittent streams, allowing prescribed fire to back into dry drainages and planting of local, native hardwood riparian species in appropriate sites, such as in lower elevation, flatter meadow systems where riparian hardwoods historically existed.

Thinning in riparian habitat conservation areas (RHCA's). We will include site-specific prescriptions where we propose commercial thinning in Category 1 and 2 RHCA's (i.e., fish-bearing streams and perennial non-fish bearing streams). We will develop these prescriptions based on slope, aspect, stream condition, soil condition, existing vegetation, large woody material, and other factors at each Category 1 or 2 site. Category 3 (ponds, lakes, wetlands, reservoirs) and Category 4 (intermittent streams or wetlands) sites may have unique prescriptions if needed, but in most cases, we will apply a "standard" prescription because we expect conditions in these Category 3 and 4 RHCA's to be similar and consistent across the planning area. *Wildlife. We will not be satisfied that project design criteria will protect riparian values or allow RHCA's to reach Riparian Management Objectives.*

We will apply standard prescriptions for all RHCA's (Categories 1, 2, 3 and 4) where we propose only noncommercial thinning. *INFISH and PACFISH buffers are based on sound science and should not be violated by RHCA logging, road re-opening, and/or road construction and heavy equipment use within RHCA buffers.*

Prescriptions will include sideboards such as, but not limited to, slope and distance from wetted edge where cutting, slash piling, or ground disturbance may occur and which trees (what size and how many) to cut. *Forest Service fish biologists and hydrologists have credited RHCA "no logging" buffers with saving fish species and population.*

Invasive plants. Houndstongue infests about 1,150 acres, mainly in stringers east of the North Fork Crooked River. Invasive annual grasses like medusahead and ventenata are present in some scablands. We would consider risk of invasive plant spread with all our proposed activities and include appropriate mitigation measures to reduce risk of introduction and spread. *The planned logging within RHCA buffers is shameless backsliding to pandering to the timber industry that is not based on good science.*

Public Comment

We welcome and value your thoughts and input to the North Fork Crooked River Forest Resilience Project. We are currently in the preliminary environmental analysis phase of the project. Comments are appreciated anytime; however, for input to be timely and considered in project design, we need to receive your comments in response to this scoping notice by close of business on September 19, 2022.

To ensure timely receipt, we encourage you to submit comments online through the Forest Service online comment system available at <https://cara.fs2c.usda.gov/Public/CommentInput?Project=61651>.

You may also email your written comments to brianna.goehring@usda.gov, but be aware that large file sizes may bounce.

Or you may mail your written comments to:

Johanna Kovarik, District Ranger
Ochoco National Forest
3160 NE 3rd Street
Prineville, OR 97754

Or you may hand-deliver your written comments to the Paulina Ranger District (3160 NE 3rd St., Prineville, OR 97754) during business hours or by placing in our secure dropbox.

These actions should be sufficient management to begin to restore riparian conditions, but not without dealing with the root sources of the problems - especially livestock grazing, commercial logging, and roading in or near RHCA's.

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Thank you for consideration of our comments. Please keep us informed of all developments with the N. Fork Crooked River timber sale/project. Karen Kalth

This document and maps in Appendix B may also be viewed at our project website in the "Scoping Period" folder: (<https://www.fs.usda.gov/project/?project=61651>).

Contact Information

For additional information about the project, please contact Brianna Goehring, NEPA Planner, at brianna.goehring@usda.gov.

Appendix A – Planning and Management Direction

Forest Plan

**The Ochoco Forest Plan (LRMP) is severely outdated and needs to be revised based on current best available science, which should be incorporated in the planning for this timber sale, which is not really a "Resilience Project."*

The Ochoco National Forest Land and Resource Management Plan (Forest Plan) was approved in 1989 and has since been amended by several decisions. The Forest Plan describes resource management practices, levels of resource production and management, and availability and suitability of lands for resource management on the Ochoco National Forest. The Forest Plan guides all natural resource management activities on the Ochoco National Forest and provides management direction through designation of specific management areas and standards and guidelines specific to these designations.

Table 3 displays Forest Plan management areas and approximate acres proposed for vegetation management in North Fork Crooked River planning area.

Table 3. Emphasis and acres of management areas in the planning area.

Management area	Management emphasis	Acres	Proposed acres (for thinning and prescribed fire, not including incidental fire in scablands)
General Forest	Produce timber and forage while meeting Forest-wide standards and guidelines for all resources.	12,271	3,902
General Forest Winter Range	Manage for timber production but consider big game habitat needs.	11,543	3,139
Winter Range	Manage for big game winter range habitat.	10,323	1,964
North Fork Crooked River Scenic Corridor	Maintain and enhance natural appearing landscape and protect the scenic river designation.	1,923	469
Old Growth	Provide wildlife habitat.	868	0
Visual Management Corridor (Partial Retention)	Maintain natural appearing character of the Forest along major travel routes.	626	377
Riparian Habitat Conservation Areas (RHCA)*	Manage 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.	2,963	983

*RHCA acres overlap with other Forest Plan Management Areas.

or less, in my experience - not long enough for any significant re-growth or increased size of retained mature trees. We field surveyed all the sales surrounding this sale area within the last 31 years, including the Deep sale, the Gaps sale, and the Black Mountain sale. We will be field surveying this sale over the next two weeks.

⊛ The Revised Eastside Screens would open the door to allow landscape scale logging of large (and inevitably old) trees through use of only a

voluntary guideline rather than a legal standard. This revision of the Revised Eastside Screens Eastside Screens would not result in "recruitment

In 1995 the Regional Forester amended Forest Plans east of northern spotted owl range. Known as Eastside Screens, the primary purpose of the amendment was "to conserve those components of the landscape – old forest abundance, wildlife habitat in late and old structural stages – in relation to larger ecosystem management to protect habitat for certain species of wildlife and to promote the vigor and health of forests." Eastside Screens contain guidelines for management of timber sales relative to Historic Range of Variability (HRV), wildlife connectivity corridors, snags, coarse woody debris, and goshawk management. Eastside Screens was revised in January 2021 replacing a 21-inch tree diameter limit with a guideline for timber sales outside of stands of late and old structural stages that emphasizes recruitment of old trees and large trees. The term "late and old structural" refers to structural stages where large trees are common, such as multi-stratum with large trees (two or more canopy layers), or single-stratum with large trees (a single dominant canopy layer of medium sized or large trees).

⊛ Retain INFISH "No logging" RHCA buffers as specified under the Eastside Screens to better protect fish species, Columbia spotted frog, and Western Ribbed mussel.

Inland Native Fish Strategy

The Inland Native Fish Strategy (INFISH) amended our Forest Plan in 1995 and provides direction to protect or enhance habitat and populations of resident native fish and gives options for management. INFISH defines interim riparian habitat conservation areas (RHCAs) where riparian-dependent resources receive primary emphasis. An interim RHCA includes its body of water (e.g., stream, wetland, etc.) and its standard width. Four different categories of interim RHCAs have different standard widths; see Table 4 below. Inside these RHCAs, INFISH management direction generally applies. Standard widths of RHCAs can be adjusted where data support change and the rationale is documented in either a watershed analysis or Forest Plan amendment. INFISH further established riparian management objectives, standards, and guidelines for activities occurring in RHCAs to achieve riparian goals. Riparian goals include maintaining or restoring water quality, stream channel integrity, channel processes, sediment regimes, instream flows, diversity and productivity of desired plant communities, riparian vegetation, riparian and aquatic habitats.

Table 4. Descriptions of RHCA categories.

RHCA category	Stream/water body type	Standard width (ft)
Category 1	Fish-bearing streams	300
Category 2	Permanently flowing non-fish bearing streams	150
Category 3	Ponds, lakes, reservoirs, and wetlands less than 1 acre	150
Category 4	Seasonally flowing or intermittent stream, wetlands less than 1 acre, landslides, and landslide-prone areas	50

North Fork Crooked River Management Plan

The North Fork Crooked River Management Plan amended the Forest Plan in 1993. This plan delineated the 34.2 miles of designated North Fork Crooked River into six segments that each have specific outstandingly remarkable values associated with them. The eight miles in this planning area include most of Segments 3 and 4. These two segments have the outstandingly remarkable value of scenery and other significant river values of botany, including the presence of large and old ponderosa pine and sensitive plant species such as Peck's mariposa lily (*Calochortus longebarbatus* var. *peckii*), and potential fisheries. Segment 4 also has the outstandingly remarkable value of recreation and other significant river value of native riparian vegetation. Management direction in this plan emphasizes protection and enhancement of scenic values through riparian improvement and upland vegetation management.

⊛ We are strongly opposed to any commercial logging, closed road re-opening, or road construction within the North Fork Crooked River Wild and Scenic River corridor. Great Grey owl, in violation of the National Forest Management Act.

