



September 14, 2022

Johanna Kovarik, District Ranger
Ochoco National Forest
3160 NE 3rd St.
Prineville, Or. 97754

Subject: North Fork Crooked River Resiliency Project; File case 1950

Dear Ms. Kovarik:

The Central Oregon Bitterbrush Broads Chapter (Great Old Broads for Wilderness) submits these scoping comments on the North Fork of the Crooked River Forest Resiliency Project. Thank you for the opportunity to provide comments. Please include these comments in the official record for the project. We have numerous concerns but will focus on our top concerns.

One of our many concerns is road density. While it's great that the district is looking at closure or decommissioning "some" roads, the concern still remains about the health of elk security and aquatic habitats for redband trout population and amphibians. We would like to see more closures and decommissioning of these roads. The project plan states that the district wants to "use road systems changes to decrease wildlife

disturbances from human interaction” and yet also states that the district will create temporary roads for commercial thinning and to provide economic opportunities. The question remains of how does this decrease wildlife disturbances when thinning occurs in areas where wildlife exist because it is a safe place for them? We oppose any creation of new roads, including temporary roads. You have identified the location of roads slated for closure/decommissioning, but have not identified the location of these temporary roads.

The project narrative also states that the plan is to “decommission specific road segments to decrease road impact to streams and riparian habitat”, while also stating the increase of large woody debris in riparian areas, which entails bringing in large equipment which requires roads. Again there is the problem of the creation of new “temporary roads”. While it is great that the district wants to improve riparian areas, the effects of the kinds of treatments proposed can have huge impacts on sedimentation of streams, springs, seeps and other special habitat. Our concern is about further degradation that may be caused by this project. There should not be any temporary roads and let nature do what nature does best to restore streams and springs. At best staff or contractors can walk in and do the riparian work, which by the way, our organization along with others are willing to do this kind of stewardship work.

From my own and other members of our organization observations and monitoring of roads in various areas of the Ochoco’s, the district cannot adequately keep closes roads closed, or monitor them to make sure they are not being used on or new roads are being created. It is pretty common to see that people are driving over and around berms, fences are either being taken down or are cut for entry, along with road closure signage removed. Currently the travel management maps are not current and up to date with more emphasis on the public regarding the closures or decommissions. How will this project be any better?

Another concern is the possible harvesting of large trees. While the eastside screens may have been recently amended to allow harvesting of some large diameter trees, we oppose any such action. The statement in question is: “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”. Instead of stating “usually not be cut” should state that there will be no cutting of trees over 21 inch dbh, including Grand Fir.

We also question the purpose and need for thinning. While some thinning for fuels reduction may be appropriate, there is growing evidence that such work will, in many cases, increase the intensity of wildfire. This happens in part because thinning allows greater drying of the forest floor due to increased wind effects and solar heating of the ground vegetation and downfall, and the reduction of tree canopies. Utilizing the cultural Native American methods of smaller, prescribed burning makes much more

sense and also has the added effect of eradicating concerns about insects and disease. The burning of “slash piles” is unacceptable as they play a critical role in carbon sequestering, along with habitat for specific wildlife. We suggest and encourage that you maintain and increase carbon storage in forest ecosystems. There is a carbon cost associated with thinning that must be considered. As stands develop from young to mature to old, they continuously recruit carbon-rich material from the live tree pool to the dead wood pool. Some of that wood gets incorporated into the soil or falls in fire refugia where it can accumulate. Logging, even thinning, can dramatically affect the accumulation of carbon in the dead wood pool by capturing mortality, diverting it from the forest, and accelerating the transfer of carbon to the atmosphere. Carbon stays out of the atmosphere much longer if it remains in the forest as live and/or dead trees, instead of being converted to wood products. Also what is important is the wildlife, birds and other wildlife that depend on downed trees and stands with multi layered canopies for their very survival.

We also wonder if the cumulative effects of this project, along with the neighboring projects (Black Mountain (2019), Gap (2016), Wolf Creek (2014), and Jackson (2012) have been considered. Are enough dense stands of trees being left for elk security habitat? Will this large, cumulatively managed area retain natural species diversity and complexity to support native species? With the removal from these combined projects of all similar sized trees and tree species, what remains is not the natural mix of flora seen in a healthy ecosystem.

The scoping document also mentions “merchantable timber which means timber of acceptable quality of species identified in the appraisal completed for lender, which are in excess of 35 years of age and which can be harvested without violation of applicable laws and regulations. “This involves some ambiguity (Hollis C. Ransom. Jr. 1958). What is your definition of or description of merchantable timber? Is it salable or marketable? Who oversees the commercial thinning so that large mature trees aren’t “felled by mistake”? The project highlights the importance of local economics. It appears that the Forest Service favors economics over environmental conservation, which is or should be your mission. We oppose the level of commercial thinning that this project proposes. The use of economic justification over the irreversible and irretrievable environmental impacts of commercial thinning is unacceptable. To use this thinking as a means to prevent or decrease wildfires is not “using the best available science”. The most recent scientific model for elk management the Blue Mountain Elk Model. The district should not use outdated science which continues to recommend large logging and fuels treatment projects.

Another additional concern is the work that this project would conduct along the Wild and Scenic River corridor of the North Fork of the Crooked River and the tributary creeks that feed into it. The project states “removal of hazardous fuels near the river.” What are you defining as hazardous fuels and how does this impact the natural and

scenic values of the Wild and Scenic River corridor? How does this enhance the scenic quality? The Wild and Scenic River Act states that “the immediate environments shall be protected” and that “watersheds and shorelines left essentially primitive to represent the vestiges of primitive America”. How will this values be protected with this project?

One last concern we would like to address is livestock grazing. It is mentioned in the project narrative but doesn't address the number of grazing allotments, the ongoing and continuous impacts of livestock grazing and how and who will monitor this. We have yet to see who is responsible and how it will be accomplished to keep the permittee's livestock out of riparian areas to allow them to recover. We request that the district take stronger measures to manage livestock grazing such as more rotations, reduction in livestock numbers, especially during drought conditions, and potential removal of livestock in the worst drought of the last 1200 years.

Again, thank you the opportunity to comment. We continue to want to work with the Forest Service in stewardship projects but want to make sure that you are looking out for the best interest of the Ochoco's Forest's natural resources.

Respectfully,

Mary Fleischmann

Leader- Central Oregon Bitterbrush Chapter of the Great Old Broads for Wilderness.

