



Dedicated to the protection and restoration of the Umpqua watershed and beyond through education, training, advocacy and ecologically sound stewardship.

July 31, 2023

US Forest Service

Re: 2021 Wildfire Roadside Danger Tree Mitigation Project #62951

Dear Project Manager,

Thank you for the opportunity to comment on the 2021 Wildfire Roadside Danger Tree Mitigation Project #62951. Umpqua Watersheds fully supports reducing travel risk on necessary roads within the project area. Many of our members recreate within the Umpqua National Forest, from camping and hiking to snowshoeing, cross-country skiing, and more.

Umpqua Watersheds recognizes and appreciates the agency and employees' tremendous effort into this plan. The attention to the variety of issues and concerns that could arise is a welcome process. We have a few comments and concerns to reiterate.

We are concerned about the post-fire projects that are unnecessary and could result in greater harm to the environment. Our concern is that roads that are unnecessary to open are part of the project. Dead-end roads where it is unlikely that the public will desire access or that there are no immediate plans for agency employees to utilize should be excluded when those areas are in Late Successional Reserve (LSR) designated in the Northwest Forest Plan (NWFP). Older forests in LSR should not be included in any commercial activity in this plan as it would counter the intent of the NWFP. It is necessary to provide some general comments on the spotted owl site maps included in the document due to the low quality of the image that prevented detailed information from being inspected (page 71 and page 73). As such, we are unable to provide specific comments. We were happy to see that provisions to avoid activity during the nesting season near spotted owl sites were incorporated into the project.

We appreciate the light touch in the inventoried roadless areas and the concern that the agency has for these sensitive areas. The impact to the areas from this project appears to be minimal and it appears that much thought has gone into the careful consideration of impacts. We would like to reiterate that only those roads that are regularly traveled are necessary for public safety. Roads that lead to trailheads within the severe burn area should be evaluated for public safety. Once the public leaves the roadways and enters the trail system within the burned areas, they knowingly accept the risk inherent with trails in burned areas. Providing easy and direct access to the public within the severely burned area could open the agency to liability. Trails in the burn area still carry risk since hazard trees are not removed along trails in the same way as they are removed along motor vehicle use areas. Umpqua Watersheds fully supports access to recreational activities. Still, we also recognize that to experience the full enjoyment of our public lands, we must accept the risk associated with the forces of nature. Recovery of these areas is already happening, and further disturbance will inhibit the natural restoration process and detract from



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the enjoyment that those areas provide to those who seek recreation, such as hunting, birding, hiking, and other outdoor opportunities.

We recognize that alternative 1 implies that federal employees will be involved in tree selection, and we would like to emphasize that. Tree selection must remain with the employees of the federal government and not with the private for-profit companies contracted to mitigate the danger along the road. Conflict of interest is a very real possibility. It has been demonstrated in the Bureau of Land Management Danger tree removal when private companies are allowed to select what constitutes a "danger tree." As an example, Hill Creek Danger Tree Removal on BLM by the private company resulted in live trees cut and unnecessary removal of trees along the creeks and downhill portion of the roadway. The conflict of interest resulted in greater damage and unnecessary removal of trees. Standing dead trees provide a multitude of benefits, including shade. Stems of large trees provide the only shade in some areas, especially those areas of catastrophic fires.

High-traffic roads for the public and the employees where a clear danger exists are the most suitable places for "danger" tree removal. Dead-end roads, especially those in Late Successional Reserve, are not suitable or necessary for most "danger" tree treatment. Live trees should never be removed, and where large dead trees over 40 inches are involved, the biomass should be retained on site for carbon storage, wildlife habitat, and other non-commercial purposes. In areas where the danger trees are below the road, and live trees exist between the road and the danger tree, those danger trees should be individually treated such that the live trees are not removed or damaged.

Overall, Umpqua Watersheds supports the treatment to reduce hazards along roads. However, the treatments should be conducted with input from the specialists the public employs. Wildlife biologists, soil scientists, hydrologists, recreation specialists, and others should actively participate in selecting the trees for treatment where their input is appropriate, and the input from those specialists should be taken seriously. When I attended the field trip to the Rough Patch area last fall, there were a diversity of perspectives on what would constitute appropriate treatments. Diversity in the forest is important, as is diversity in perspectives of which areas and trees are necessary to treat.

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