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July 31, 2023

Alice Carlton
Forest Supervisor
Umpqua National Forest
2900 Northwest Stewart Parkway
Roseburg, OR 97471

Attn: 2021 Wildfire Roadside Danger Tree Mitigation Project

Dear Supervisor Carlton:

WildEarth Guardians (“Guardians”) files these comments to the U.S. Forest Service’s Draft Environmental Assessment (“Draft EA”) for the 2021 Wildfire Roadside Danger Tree Mitigation Project in the Umpqua National Forest. The Forest Service proposes to implement what it describes as “danger tree mitigation” along approximately 139 miles of roads in the Umpqua National Forest. The proposed activities would affect approximately 7,492 acres. Of this, nearly 697 acres would involve the cutting and removal of trees for commercial purposes while another 4,462 acres would involve fuel treatment activities. Another 2,332 acres would involve felling and leaving trees on site.

WildEarth Guardians is a nonprofit conservation organization with offices in Washington, Oregon, and five other states. Guardians has nearly 200,000 members and supporters across the United States and works to protect and restore wildlife, wild places, wild rivers, and the health of the American West. Guardians and its members have specific interests in the health and resilience of public lands and waterways.

I. Tree Selection Criteria

The Forest Service says that the tree selection criteria for the project was based on the Field Guide for Danger-Tree Identification and Response Along Forest Roads and Work Sites in Oregon and Washington (Filip et al., 2016) (Danger-Tree Field Guide). *See* Draft EA 18; *see also id.* App. C. According to the Draft EA:

For roadside danger trees, there are three levels of failure potential: low, likely, and imminent. Most of these dead trees have a failure potential of likely or imminent. This means that many of the trees identified for treatment have a high probability to fail within

the next 3-5 years. However, the Danger-Tree Field Guide categorizes the failure potential for dead cedar and large-diameter Douglas-fir at a lower likelihood than other species of dead trees in the project area. Nevertheless, the Danger-Tree Field Guide acknowledges that when severe wildfires have killed high numbers of trees over a short period of time there is a higher risk for tree failures to occur (pg. 44). This is because stands are often more open following large disturbances, and trees may be more prone to windthrow or shatter.

Draft EA 18. This misstates what the Danger-Tree Field Guide says:

For most recently killed trees, exposure duration along roads mainly is intermittent (drive-by traffic) and therefore the trees are not a danger. However, due to the large number of recently killed trees in [severe wildfire or beetle epidemic] situations, there is a higher risk of tree failures occurring, because stands are often more open following large disturbances, and trees may be more prone to windthrow or windshatter. After five years, most of these trees (except cedar, juniper, larch, or large Douglas-fir) will have imminent-failure potential and therefore will become danger trees. The challenge is deciding when to treat such trees that are not now a danger but will become danger trees in five years.

Danger-Tree Field Guide, 44. In other words, the Danger-Tree Field Guide starts with the broad statement that there is a “higher risk” of tree failures after a large disturbance because stands are more open. It then states that after five years, most trees will attain imminent-failure potential except for cedar, juniper, larch, and large Douglas-fir trees.

The Draft EA flips that by first acknowledging that dead cedar and large Douglas-fir trees have a lower failure potential compared to other species. But then it states the Danger-Tree Field Guide “nevertheless” would place dead cedar and large Douglas-fir at a “higher risk” (i.e., imminent failure potential) following large disturbances. But that is not what the guidance states.

Moreover, the Draft EA ignores other failure indicators. For example, the Danger-Tree Field Guide explains that old dead trees categorized as having an imminent failure potential should not only have been dead for at least five years but should not have any foliage or fine branches and the bark should be absent or falling off. Danger-Tree Field Guide 27. And, again, the guide exempts cedar and large Douglas-fir from that assessment. *Id.* This information is left out of the Draft EA.

The Forest Service should reconsider how it is using the Danger-Tree Field Guide to ensure that only those trees that are truly danger trees are removed. The Forest Service should also consider an alternative where no cutting of cedar and large Douglas-fir trees would occur. How would such an alternative change the proposed treatment acreage?

II. The Draft EA fails to address any travel management issues.

According to the Forest Service, “[n]o Travel Management Decisions are proposed with this EA.” Draft EA 17. Guardians believes this is a missed opportunity, especially since the project

area encompasses a large part of the Umpqua National Forest with hundreds of miles of roads being reviewed in the development of the project. We respectfully request the Forest Service reconsider whether certain roads, particularly those that have a lower maintenance level and/or receive infrequent use, should be closed, stored, and/or decommissioned. That could result in fewer trees being cut and removed while also reducing the miles of road that need to be maintained. It would also reduce road densities, benefiting wildlife and fish habitat.

When the Forest Service completed its Travel Analysis Report (TAR) for the Umpqua, it unequivocally stated that it would continue to engage with the public on travel management “at each future project level planning effort” and that analyses like the one here would be used “to identify specific opportunities to bring the Umpqua National Forest closer to a road management strategy that emphasizes reduced environmental risk with a road system that is more aligned with long term funding.” TAR 26. The Forest Service also stated that it would “integrate road treatment options to maximize restorative and cost reducing changes to the road system” when planning timber sales. *Id.* 27. Moreover, the Forest Service said that travel management considerations “should be considered whenever there are opportunities to migrate the system to a more sustainable state.” *Id.* 28. A project that involves extensive logging along 139 miles of system roads is such an opportunity.

The Forest Service’s blanket refusal to consider travel management decisions runs counter to its own TAR and should be reconsidered. The Forest Service should develop an alternative that considers various travel-related options for closing, storing, and/or decommissioning roads in lieu of cutting potential danger trees. Such an alternative could focus on roads that are infrequently traveled and/or have a lower maintenance level (e.g., ML 2).

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Talbott", written over a horizontal line.

Ryan Talbott
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