GREATER HELLS CANYON COUNCIL

September 13th, 2023

US Forest Service, Wallowa-Whitman National Forest
District Ranger Kendall Cikanek
1550 Dewey Ave, Suite A
Baker City, OR 97814

Submitted electronically to https://cara.fs2c.usda.gov/Public//CommentInput?Project=64450

RE: Comments on Clarks Vegetation Management Project scoping

I am writing on behalf of the Greater Hells Canyon Council (GHCC) regarding scoping for the Clarks Vegetation Management Project ("project" or "project area"). GHCC is a non-profit conservation organization based in Northeast Oregon with over 2,000 supporters. We were founded in 1967 (as Hells Canyon Preservation Council), and our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

GHCC is submitting comments to the Forest Service ("agency") on this project for a number of reasons. It's an area of importance to our supporters in Pine Valley and the greater NE Oregon region, and sits at an critical intersection between the Eagle Cap Wilderness and the Hells Canyon NRA. Additionally, this region of the Wallowa Whitman is of particular interest to GHCC supporters who hunt in the Pine Creek unit.

During scoping, GHCC staff and members spent several days driving around the project area and visiting a number of the proposed units. **If you take one thing from our comments, it's that we are requesting a robust analysis of fish and wildlife impacts for this project, which at this time appears to be lacking.**

Between Clarks, Morgan Nesbit, and the 30+ other smaller timber sales of the last 50 years, the footprint of logging in this part of the Wallowa-Whitman is significant. Additionally, the forests of the private, industrial lands adjacent to the National Forest have been extensively clear-cut over the past several years. This has caused great concern in the local community. Given that, we request that the agency complete an Environmental Impact Statement (EIS) with a robust cumulative effects analysis.

As you proceed with an Environmental Assessment (EA), or an Environmental Impact Statement (EIS), please develop and analyze an Alternative that will:

- provide the highest level of protections for the ODFW Priority Wildlife Connectivity Area that is present in the project area.
- analyze for accurate road densities (including user created roads and routes/non-system roads), and take action to improve elk security habitat
- protect ecological values in the remaining unroaded lands within the project area

We also ask that you develop and analyze an Alternative that does not include:

- any use of the revised Eastside Screens , which were recently found in federal court to be unlawfully amended in violation of NFMA, NEPA and the ESA
- any commercial treatments in MA-15 Old Growth Management Areas
- any temporary road building

Please consider the following additional comments in your planning:

Wildlife analysis, impacts to wildlife habitat, and the ODFW Priority Wildlife Connectivity Area
We remain concerned that the agency is missing the big picture on protecting connectivity and corridors in pursuit of silvicultural goals. Has analysis beyond an HRV analysis been completed to justify how this project will "provide habitat for a wider range of wildlife species"? Please explain which data the agency has used in considering impacts to wildlife habitat, connectivity, and corridors.

We request a robust wildlife analysis be completed for this project, including impacts to ESA-listed aquatic species such as bull trout, and elk security habitat. A full analysis of road densities in the project area should be completed, including miles of user-created roads and routes, if the agency wishes to get a clear picture of existing impacts. GHCC staff and volunteers are available to collect data for the agency and map user created roads and routes if necessary.

The project area is highlighted in ODFW's Oregon Connectivity Assessment and Mapping Project (OCAMP), a "multi-year, collaborative effort to analyze and map statewide wildlife habitat connectivity at fine resolutions for 54 species."[1] **By our estimation, OCAMP has identified approximately 3,400 acres within the project area as a Priority Wildlife Connectivity Area (PWCA)**, which represents "an interconnected network representing the parts of the landscape with the highest overall value for facilitating wildlife movement in Oregon".[2] Please explain which data the agency has used in considering impacts to wildlife habitat, connectivity, and corridors. **We estimate that there are at least 16 proposed units within the PWCA, and that a number of miles of temporary road would be constructed to access those units. We request no commercial units or temporary road building in any unit that overlaps with a PWCA.**

We invite the agency to incorporate the recent guidance[3] issued by the Center on Environmental Quality on March 21, 2023 that "encourages Federal agencies to promote greater connectivity across terrestrial, marine, and freshwater habitats, as well as across airspaces, to sustain biodiversity and to enable wildlife to adapt to fluctuating environmental conditions, including those caused by climate change." It also elevates "the conservation, enhancement, protection, and restoration of connectivity and corridors as a programmatic goal" and "planning at the scale of landscapes, waterscapes, or seascapes rather than at the scale of an individual project".

[1] https://oregonconservationstrategy.org/success-story/the-oregon-connectivity-assessment-and-mapping-project-ocamp/
[2] *Id.*
[3] https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf

Impacts to MA-15 Old Growth Management Areas
We visited all of the proposed units in Old Growth Management Areas and observed a variety of stumps from previous logging. We also observed a wide variety of species of old growth trees (including ponderosa pine, western larch, Douglas-fir and grand fir) throughout the units that were not in direct competition with each other, and understory vegetation associated with moist forests. While there are some truly dry pine sites in this project area, our observations in the Old Growth Management Areas did not lead us to believe that shade tolerant trees were merely invading from adjacent stands as the scoping notice suggests. One grand fir measured in at 38" DBH, making clear that grand firs had indeed been there for as long or longer than the less shade-tolerant species. **Commercial treatment in these stands is not appropriate, and we request that these units be dropped.**

Cumulative Effects
This region has had an abundance of timber sales over the past 50 years, and it is evident. As the crow flies, it's also in relatively close proximity to the Morgan Nesbit project. When taken together, this area – which has very clear value from a wildlife habitat connectivity standpoint – has already experienced significant impacts from commercial logging, and will see more with Morgan Nesbit. Additionally, the extensive clear-cutting on nearby private industrial forest land has affected the overall forest canopy. How do these interact with each other and the project? Please complete a cumulative effects analysis addressing this.

Road Building
The exceptional importance of this area from a wildlife habitat standpoint, combined with a lack of Travel Management Planning for this forest, makes us very concerned about the creation of any additional roads, including temporary ones. Temporary roads have permanent impacts on soils, despite efforts to rehabilitate the roadbeds after their use. Despite efforts to block access to these temporary roads after their use during the project, it is not uncommon for these roads to become user-created motorized routes.

Please create and analyze an alternative with no miles of temporary roads. Also, please inform the public about how many miles of temporary roads you would like to build, including how many of those would be located on the template of existing roadbeds and how many would be located on previously undisturbed soils. Existing road densities across much of the Forest are well above management objectives, which limits habitat effectiveness for elk. Please use a distance-banding approach to analyze the impacts of roads on elk. As is noted in ODFW's comments dated September 5th, 2023, this is an opportunity for the agency to address issues with elk security habitat and improve it, something that would benefit a variety of stakeholders including hunters and private landowners.

Please also address how any temporary road building may impact ESA-listed bull trout.

Riparian Habitat Conservation Areas (RHCAs)
Protecting entire riparian systems, including the upper reaches and headwaters, is imperative in order to maintain hydrologic function and the full suite of habitats needed for fish and wildlife throughout their life cycles. Riparian areas are ecologically important and sensitive areas and they are incredibly valuable for fish and wildlife and habitat connectivity. Clean water and healthy hydrology depend on healthy riparian ecosystems.

We understand the concerns related to fuels and forest structures in riparian areas in the context of the Clarks Project. However, we request that the proposals for forest management in riparian areas will proceed with strong protections for habitat connectivity and the sensitive nature of riparian ecosystems.

We very much appreciate the approach that the Whitman District applied on the Little Dean project in actively surveying to identify pockets of surviving broadleaf native riparian shrubs and trees; specifically designing limited and targeted treatments to benefit those native riparian hardwoods; considering the potential for increased access to riparian areas by cattle resulting from riparian forest thinning and mitigating to reduce potential damage from increased grazing; and monitoring the results. We are cautiously supportive of a similar approach on the Clarks Project.

However, we remain concerned about the impacts of machinery within the Riparian Habitat Conservation Areas (RHCAs). We encourage the Forest Service to consider treating riparian areas with hand thinning and controlled burning, rather than using mechanized equipment.

We encourage the Forest Service to restrict the footprint of mechanized equipment to remain outside the Riparian Habitat Conservation (RHCA) areas. This would provide protections from both logging equipment and mechanized non-commercial thinning equipment.

As described above, we are concerned about the proposed logging of steep slopes in riparian areas, particularly using ground-based tethered logging. Please consider limiting all proposed thinning operations on steep slopes to hand thinning and prescribed burning.

Please develop an Alternative in the upcoming Environmental Assessment (EA) that limits riparian fuel reduction treatments to hand work only. Thank you.

Use of the amended Eastside Screens

Forests of the Blues, including those in the project area, have significant potential to mitigate the effects of climate change by storing aboveground carbon[4]. A recent scientific study found that the biggest and oldest trees covered by the rule make up only 3% of regional forests in the Pacific Northwest yet store 42% of forest carbon.[5] They also provide critical habitat for wildlife, keep water clean and cold, are resilient to wildfire, and are at the core of cultural values.

Please confirm that the project will not authorize cutting of any trees over 21 inches, consistent with the original 1994 Eastside Screens. As you are aware, Judge Hallman of the District of Oregon recently ruled that the Forest Service's 2021 Amendment to the Eastside Screens which eliminated the 21-inch rule was unlawful under NFMA, NEPA and the ESA and that the Screens Amendment should be vacated. See Greater Hells Canyon Council v. Wilkes, Case No. 2:22-cv-00859-HL, ECF 97 (August 31, 2023).

[4] Law BE, Berner LT, Mildrexler DJ, Bloemers RO and Ripple WJ (2022) Strategic reserves in Oregon's forests for biodiversity, water, and carbon to mitigate and adapt to climate change. Front. For. Glob. Change 5:1028401. doi: 10.3389/ffgc.2022.1028401

[5] Mildrexler DJ, Berner LT, Law BE, Birdsey RA and Moomaw WR (2020) Large Trees Dominate Carbon Storage in Forests East of the Cascade Crest in the United States Pacific Northwest. Front. For. Glob. Change 3:594274. doi: 10.3389/ffgc.2020.594274

Vacatur of the Screens Amendment results in the reinstatement of the 21-inch rule as the controlling Forest Plan standard with which this project must be consistent. 16 U.S.C. § 1604(i).

Analysis and mapping
We were excited to hear that the Wallowa-Whitman Forest has new lidar data for the entire Forest that will provide more recent and much higher resolution data. Was the new lidar data used? How does the agency plan to reconcile pieces of the project planned with older data vs. new data? When were stand exams conducted and for where? Please disclose which data was used to conduct the HRV analysis. And if new lidar data was used, please discuss the differences between models.

Strategic Treatments for Fuel Reduction
We generally support a strategic approach to fuel reduction treatments with a goal to protect values at risk and the safety of the public and fire management workers. These goals are best achieved through *limited* vegetation treatments on *specific and strategic locations* on the landscape to assist fire managers in the event of a wildfire, rather than widespread and /or heavy logging across extensive forest acreage.

This approach can be implemented using potential wildland fire operational delineations (PODs), potential control lines (PCL), and defensive fuels profile zones (DFPZs).

Potential control lines can be identified and reinforced with fuels reduction treatments anchored into the existing road system and reinforced by natural barriers, areas burned in past wildfire events, and/or past vegetative treatments. Proposed treatments would not necessarily be designed to stop a wildfire by themselves but would provide wildfire management workers a higher probability of successfully managing a wildfire with indirect suppression tactics such as "burn outs". These fuel breaks would be utilized to limit fire size by compartmentalizing the project area and creating PODs. Compartmentalization of the project area would increase opportunities for future planned and unplanned fire.

Creating Fire-Adapted Communities as Part of the Cohesive Wildfire Strategy
One of the four primary factors identified in the Cohesive Wildfire Strategy is creating fire-adapted communities. This aspect of the strategy describes an opportunity to engage communities and work with them to become more resistant to wildfire threats and provide education and prevention messages targeted at creating defensible space, fuels reduction, and improved structure access.

We encourage the Forest Service to use the development of this project as an opportunity to fully partner with other agencies and the local communities to achieve defensible space improvements involving homes and communities in the vicinity of the project area.

Prescribed fire
We appreciate the Forest Service including plans to implement prescribed fire across the project area. We very much support this approach as an important part of forest restoration.

Aspen treatments
Generally speaking, we support non-commercial thinning to restore aspen stands. The appropriate post-treatment fencing should be built and maintained. The inclusion of this in the project is appreciated. GHCC staff and volunteers are available to assist with fence building projects.

Thank you for the opportunity to participate in this planning process and for your review of these comments. GHCC looks forward to working with the Forest Service as this project progresses. Please don't hesitate to contact me with any questions.

Sincerely,

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