

Blue Mountains Biodiversity Project Scoping Comments on the
Clarks Fuels Management Project (aka the Clarks Integrated Vegetation Management Project)

To: Kendall Cikanek, Whitman District Ranger, Wallowa-Whitman National Forest
1550 Dewey Ave., Suite A, Baker City, OR 97814

From: Karen Coulter, Director, Blue Mountains Biodiversity Project
[REDACTED]

First, we were not provided the opportunity to attend the only public open house to answer questions in Halfway, Oregon, since the only notice we received was in the scoping letter of August 8th, which we received by mail after August 10th, the date of the public open house meeting. I did attend the Baker City Watershed timber sale open house when notice was provided enough in advance to attend. I likely would have attended the Clarks open house meeting if I had received enough advance notice, as I found the Baker City Watershed open house to be informative—and I actually could have attended the Clarks open house on August 10th.

Looking at the all-encompassing planned scale of commercial logging planned for the Clark's timber sale project area, this represents forest liquidation on a landscape scale, based on old school timber sale rotations that systematically logged across the landscape regardless of existing conditions, but now with even fewer restrictions. The Forest Service is now neglecting to protect the already limited multiple use values of the existing Forest Plan. For instance, the District staff are planning to "restore" with commercial logging designated Old Growth Preserves (MA 15) that are protected from scheduled timber harvest (which this is) under the existing Forest Plan. We are strongly opposed to any commercial logging and "temporary" road building or closed road re-opening in designated Old Growth Preserves.

Likewise, there seems to be no consideration of protecting forest thermal and hiding cover for elk, deer, and other wildlife species in winter and summer "big game" ranges. There is also no consideration of recreational uses and their protection from logging impacts and road re-opening or construction in the scoping letter. We ask that the Forest Service refrain from commercial logging except to diversify young pine plantations by thinning them to create small openings (only up to 1 acre, building on natural openings) without re-planting, to allow for natural regeneration, variable tree sizes and species, and variable density spacing, including retention of hiding and thermal cover, as well as to provide recreational screening and aesthetic values.

Designated Wildland-Urban Interface areas tend to be far more expansive than would be effective in protecting communities, as the most effective fire risk reduction is done immediately adjacent to residential communities, not in the back country. 38% of the timber sale project area being part of the Wildland-Urban Interface seems excessive, as WUI boundaries should not be based on non-residential private or public lands that are adjacent to National Forest boundaries. To include non-residential land effectively removes the wild land part of the Wildland-Urban Interface, allowing for degradation of wildlife habitat and recreational or cultural uses of the wild lands. Such broad WUI boundaries are typical—in one case designating an entire rural county as within WUI boundaries, overlapping the Malheur National Forest.

Outdated Forest Plans with needed overdue revisions have been thrown out, rather than worked out and established. Outdated Forest Plans serve to allow the Forest Service to continue to use outdated science and outdated weak standards and guidelines based on Forest Plans signed in 1980 or 1990. These outdated Forest Plans violate the National Forest Management Act, which requires Forest Plan revisions

every 10 to 15 years. These outdated Forest Plans, including that for the Wallowa-Whitman National Forest, do not incorporate consideration of the effects of extreme climate change, needed mitigations and reduction of Greenhouse gas emissions, the need to preserve all forest carbon sequestration and storage through retention of all large trees and mature forest cover. The Blue Mountains outdated Forest Plans also do not incorporate updated science, including scientific critique of the Forest Service use of the Historical Range of Variation (HRV) concept, and of fire regime class and condition. There is no in-depth analysis in these existing Forest Plans of what the Forest Service should be doing to reverse or significantly reduce global warming and the Sixth Mass extinction of wildlife, both caused by humans under industrial Capitalism. Yet these are the biggest global crises of our time.

These existential threats to ecosystem functioning, biodiversity, and organized human civilization cannot be ignored by the Forest Service, as the effects are cumulative. Yet the agency continues to contribute to these overwhelming threats instead of changing course. Commercial logging is the biggest source of Carbon dioxide emission in Oregon. The Forest Service needs to re-direct its mission to protecting the National Forests, not cumulatively eliminating their natural structure, forest cover, water retention, and biodiversity. Protecting the newly established National forests from logging as Forest Reserves was the original mission for the Forest Service, which is never mentioned by the agency. Now the Forest Service is on a path leading to forest destruction through unsustainable commercial logging. Current “commercial thinning” now resembles virtual clearcuts with very low basal area retention on a landscape scale far bigger in size than past timber sales, and on an unsustainable logging rotation of only 30 years or less.

We are wary of the scale of proposed logging in the Clarks sale, the likely high intensity of the planned logging, and the typically short return interval for logging the same forest areas again, based on the trends we are seeing currently across the Blue Mountain Forests. We are stunned by the huge scale of proposed commercial logging across the Morgan Nesbit timber sale, which spans two Districts of the Wallowa-Whitman National Forest, including Hells Canyon Recreation Area, and more never logged forest proposed for logging than seen before in a single timber sale. We were deeply disturbed by the unwillingness of the District Ranger to negotiate and make any changes to the Patrick sale, when all we were asking as our main demands was to drop commercial logging and road building in Riparian Habitat Conservation Areas (RHCAs) and to drop logging in a narrow band of moister mixed conifer old growth stands that represented the best wildlife habitat in the much larger sale area.

As we have been field surveying the commercial logging sale units in proposed timber sales on up to five to six National Forests across the Blue Mountains Forests and a National Forest in Central Oregon over the last 32 years, we are in a good position to assess regional logging trends on the Blue Mountains National Forests. We now see these logging trends as now amounting to planned forest liquidation.

The Clarks sale is unfortunately part of this overall regional trend, based on the scoping information and the draft sale map we received (a larger scale version of the scoping map.) I also asked the silviculturist about the types of logging planned and the intensity of the logging, based on what has been established by this point in the NEPA public process. It looks like the commercial logging is planned for virtually everywhere in the project area where there is still mature trees. We are deeply concerned about the planned logging of large trees, and inevitably, old trees.

The timber emphasis high acreage in Table 1 is reflective of an outdated Forest Plan, as logging is no longer a primary economic source of jobs in eastern Oregon, while recreational uses and income have been increasing. The outdated Forest Plans and current Forest Service staff have systematically failing to disclose the full range of best available science and scientific controversy regarding the Forest Service use

of the Historical Range of Variability concept, as in the Clarks scoping letter on page 2, where the pre-European settlement baseline conditions evidence is not disclosed, including the type(s) of evidence, the date(s) of evidence, and the location of any such baseline evidence for determining the HRV. Yet despite the scientific controversy over the use of HRV (which is not disclosed), “The departure away from HRV is the basis for determining the purpose and need for treatment” (aka primarily logging.) The Historical Range of Variation was meant to be a guideline for establishing natural pre-European forest conditions to compare with the effects of management, not for use as a rationale to justify more logging. Often the Forest Service HRV evidence cited is from evidence dated just after a period of heavy commercial logging, as with a 1927 date on the HRV “baseline” used for a Malheur National Forest timber sale, or the claimed baseline HRV evidence is from a location far away from the area planned for a timber sale, often with different forest types, elevations, and/or topography. What specific types of evidence were used, from what locations, and with what survey methods, to determine a pre-European settlement condition for the Clarks timber sale?

The perceived “need” to reduce fire risk is often also questionable, including the agency’s failure to disclose scientific controversy over the efficacy of reducing fire intensity and spread in the back country, as opposed to immediately adjacent to occupied homes.

The so-called “Defensible Fuel Profile Zones” should not be planned for the back country, minor spur roads, or ridgelines, nor with excessive zone widths such as more than 50 feet and up to 500 to 1,000 feet on each side of the roads. Such extensive biomass reduction zones eliminate huge areas of wildlife habitat for species sensitive to disturbance or needing greater structural complexity or canopy closure. Huge heavily logged biomass reduction zones also destroy scenic and recreational values, often in violation of Forest Plan scenic “viewshed” standards for high use recreational roads. Elk are documented to avoid using 300 feet of otherwise suitable habitat on either side of open roads. Extensive biomass reduction zones along roads could result in overlapping DFP zones, driving elk and other disturbance-sensitive wildlife even further away from the roads and from big blocks of previous security habitat through the expansion of open clearcut-like openings. Elk security habitat could be eliminated to the point where the area would lose much of the resident and migratory elk population in the timber sale area.

Elk and deer hunting are the primary recreational uses of the Blue Mountains National Forests—including the Wallowa-Whitman. Cultural uses of indigenous peoples are protected by treaty rights, including the ability to hunt and fish, with flourishing herds and fish runs to provide food.

Further, the ever further extension of “Defensible Fuel Profile Zones” from the roads is futile, and just an excuse to remove more biomass and to commercially log, as wildfire embers have jumped the McKenzie River and even the Columbia River, with the Eagle Creek Fire. An extreme climate change-driven fire will not be stopped or reduced enough to ensure public safety under now typical 97 percentile conditions, with stronger winds driving the flames, increased wind speed, more prolonged droughts, and record-breaking heat waves. Wallow-Whitman fuel specialists acknowledged this reality on a recent field trip on Mount Emily with La Grande Ranger District staff. Some measures could be taken immediately adjacent to the most major access roads, such as small tree non-commercial thinning up to 9” dbh (which usually represents the most density near roads) and prescribed burning, and/or some lower branch pruning on mature trees for some measure of temporary greater public and firefighter safety. However in most cases, small tree thinning and prescribed burning would just stimulate regeneration of dense young spindly thickets, greatly increasing flammability. This is especially the case with Lodgepole pine, which is stimulated to regenerate densely by burning in particular.

A basic problem with outdated fire risk reduction through “fuel” reduction is that the weather (ambient temperature, low humidity, and high wind speeds) are the key drivers of fire intensity and fire spread, not “fuel loads.”

Moist mixed conifer forest types retain moisture, and should not be logged or prescribed burned, as both would result in drying out the microclimate conditions, removing cooling shade and plant cover, as well as large woody debris that retains moisture at the ground level. Scientists at a Region 6 public meeting in Baker City years ago concurred that moist mixed conifer forest types are not a priority for fire risk reduction management. This scientific consensus has not changed since that meeting, yet the Forest Service is still relying on outdated science in the Forest Plans from 1980 and 1990. The National Forest Management Act requires that National Forest Plans be revised comprehensively, based on current available science, every 10 to 15 years. With lag times of up to 12 to 14 years between proposed Forest Plan revision decisions that are then thrown out, only to revert to the outdated Forest Plans, it seems that the agency is not fully committed to revising Forest Plans properly. Thus a cycle of conceptualizing new Forest Plans through a process that lasts over a decade, only to toss out the revised versions and revert to the old plans seems to be used by the Forest Service to perpetuate outdated and inaccurate rationales and science from 1980-1990 business as usual heavy logging. These outdated logging practices are now escalated to unsustainable, very short logging rotations of only up to 30 years between timber sales in the same areas, now at a landscape scale, with increased logging intensity to the point of virtual clearcutting. Cumulatively, these disastrous trends equate to systematic deforestation—forest liquidation.

There is significant scientific controversy over the Forest Service use of “fire regimes” and fire “condition classes”, which are used to rationalize commercial logging and other biomass removal at the expense of wildlife habitat degradation, and loss of water retention, soil productivity, recreational values, and carbon sequestration and storage needed to reduce climate change effects. The agency has been using the public’s fear of fire to justify continued overlogging. Yet scientific controversy over agency assumptions regarding fire conditions and where fire risk reduction is most effective has not been disclosed and discussed in Forest Service Environmental Assessments, Environmental Impact Statements, and Scoping letters. These inaccurate assumptions and misguided management practices are continued despite current best available science refutations of the assumptions.

The “desired future condition” is determined solely by the Forest Service, not by the public that the agency is supposed to serve, nor by the full range of best available current science. The Forest Service also determines “when these conditions are at levels where they need to be addressed to protect or enhance beneficial values”, leaving the agency unaccountable to the public, as the Forest Service also determines what “beneficial values” to “protect or enhance”, such as conversion of the forest to a homogenous tree farm for the timber industry. The Wallowa-Whitman National Forest’s current condition reveals systematic Forest Service conversion of natural, biodiverse forest to young Ponderosa pine or larch plantations through clearcutting and virtual clearcutting over decades.

The stated Purpose and Need for the Clarks timber sale (aka “Project”) is so broad as to be meaningless, not site-specific, and allow for commercial logging in any given situation where mature or younger-mature trees still exist. Thus virtually all of the project area is planned for commercial logging, including healthy and resilient forest. The agency is thus free to pick their rationale for logging based on a broad spectrum of potential conditions, including “to improve forest health, resiliency to disturbance, reduce the risk of high intensity fire and provide economic benefit to the local economy”, which can cover virtually any forest situation. (Scoping letter, “Purpose and Need”, p. 1)

The Clarks scoping letter then clarifies just how broadly applicable the “Multiple Resource, Safety, and Economic” Purpose and Need is, based on outdated science, even if logging and other management may not be the best way to attain these conditions and goals. (See bullet points under this heading at the end of p. 1 and the first section of p. 2) In fact, logging, road re-opening, and road construction can further exacerbate ecological degradation from past timber sale management in the following ways, creating perpetual recourse to renewed logging and roading that repeats mistakes and compounds negative impacts, that are then used as justifications for the next timber sale.

Logging mature and large trees as planned would result in removal of the most fire resistant tree size classes, as well as removing some of the most fire resilient tree species, including Ponderosa pine and Douglas fir. Homogenizing the forest into young, widely spaced trees allows for fires to move fast and intensely through the stands, as smaller, younger trees are more flammable, with more low branches, crowns closer to the ground, and thinner bark at the base compared to mature and large (and usually old) trees.

This conversion management is contrary to the goal of limiting “fire spread within private lands.” (Scoping letter, p. 1) More intense fire caused by removal of many mature and large trees and in-growth of smaller young trees stimulated by opening the canopy, plus leaving higher levels of very flammable logging slash would result from the Clarks sale. Thus proposed management is contrary to creating “conditions that would allow for firefighters to be safer and more successful in protecting lands and resources within and around the Clarks project area” (Scoping, p. 2) Logging also removes cooling shade and depletes moisture retention.

Commercial logging in Riparian Habitat Conservation Areas as planned displaces and compacts soils, Displacement of soil layers adds excess sediment to streams harmful to fish—especially from logging steep slopes. Heavy equipment compaction of soils stifles riparian plant regeneration by compacts soil in skid trails, re-opened or constructed roads, landings, and other areas of heavy equipment use. Preservation of riparian plants, trees, and plant cover in general is critical to retaining moisture in the drainage, stabilizing slopes, filtering out excess sediment before it reaches streams, and contributing to shading throughout the Riparian Habitat Conservation Area, cooling micro-climate conditions and retaining moisture above and within the riparian zone.

Logging within Riparian Habitat Conservation Areas (RHCAs) does not replicate a natural disturbance regime, as claimed on Scoping p. 2. Instead, logging introduces many unnatural impacts to riparian ecosystem functioning, such as removal of large trees that would otherwise eventually fall and introduce large wood in streams to create pools for fish and cool the water temperature. Removal of biomass in general in riparian areas reduces moisture retention from down wood.

Many aquatic and riparian-associated wildlife species, such as Threatened and Sensitive-listed fish species, including Threatened Mid-Columbia Steelhead trout and Sensitive Redband trout, and Sensitive Columbia Spotted frog and salamanders, such as Long-toed salamanders, need cool, moist conditions that are lost after logging and biomass removal.

The RHCA “no logging” buffers under the Eastside Screens (INFISH and PACFISH) are still based on sound science and should not be violated through logging and road re-opening construction within those RHCA buffers. Thus commercial logging, closed road re-opening or construction, and “temporary” road construction should not take place within RHCAs, as this management would be contrary to the stated purpose and need “to enhance or restore the characteristics of ecosystem function within upland and riparian systems, instead disrupting and degrading riparian and upland ecosystem functioning. Upper levels of RHCA buffers are often slopes above drainages or streams. Even outside riparian zones, these

upper or outer buffers are critical for retaining cooling shade and moisture retention for the drainages as a whole, regardless of whether these outer buffer zones have drier plant associations. Mature and large tree removal threatens reduction in moisture and water retention, excess sediment introduced into fish habitat, lack of large tree recruitment into streams over time, and loss of riparian biodiversity.

We are strongly opposed to any commercial logging and tree removal within RHCAs. Generally, any particularly dense conifer regrowth in RHCAs is comprised of only small, young trees, which could be non-commercially thinned by hand or which could be prescribed burned in dry forest types to allow for more riparian hardwood growth along stream channels. Mature and large conifers in RHCAs are more likely to not burn or burn more lightly. Many RHCAs have been commercially logged in the past, bearing witness to well documented negative impacts that this timber sale would repeat.

Commercial logging by the Forest Service in the Blue Mountains Forests has been used chronically to convert the forest to timber industry-preferred species—mostly Ponderosa pine and Western larch and some Douglas fir—in the form of even-age, single or few tree species, homogenous plantations with little biodiversity of plants or wildlife. Currently planned logging in the Clarks project area would have generally the same effect.

Planned transformation of more natural forest conditions to simplified structure and less tree species diversity is contrary to the purpose and need goal “to increase the structural complexity and species diversity of vegetation to provide for a wider range of wildlife species within the Clarks project area.” More edge habitat would be created by logging but edge-adapted species are mostly common, such as Great Horned owl and small rodents, whereas wildlife species needing big blocks of suitable interior habitat with mixed conifer forest are mostly rare and declining, such as marten, lynx, Pacific fisher, and wolverine. This is due in large part to homogenization and fragmentation of the forest by logging and greatly reducing the diversity of tree species and plants that would naturally occur. This loss of tree and plant diversity and complex structure leads to loss of wildlife species diversity as a consequence.

Prioritizing over-logging on a landscape scale, on unsustainably short logging rotations and higher intensity logging to very low basal areas is contrary to the purpose and need goal “to maintain and enhance local communities and economies by providing a diversity of resource management activities [and] recreational opportunities.” (Scoping, p. 2) Instead, there is likely to be a boom-bust economic effect on local communities that greatly reduces future opportunities for future timber outputs, other forest products, and recreational uses. There is no identifiable benefit to recreational values and opportunities in this proposal. Local economies need to diversify to ensure the vibrant future of rural communities, not rely on unsustainable heavy logging on a landscape scale, which the Clarks sale would cause.

Based on the discussion above, the proposed management actions would be contrary to most or all of the stated purpose and need for the Clarks project. Even the name of the Clark’s timber sale is contradictory and evidently undecided, as it is called the “Clarks Integrated Vegetation Management Project” in the scoping letter, yet the advised subject name for comments is “Clarks Fuels Management Project” (also in the Scoping letter). Which is it? A fire reduction project or an “integrated vegetation management project”, which is so broad and ambiguous in interpretation as to allow for any kind of management. Both “project” names are euphemisms for “timber sale”, which is the primary and almost exclusive management planned.

Re: “Economic benefit to the local economy”, what restoration is planned? Logging is not ecologically sound restoration, as it creates unnatural impacts and distorts or degrades ecological processes. There is no guarantee that a local logging contractor would be chosen or that a local mill would be used. We have

already seen loggers from Sweet Home and even further away in Western Oregon being used for central Oregon timber sale work.

There is no consideration in the scoping letter of the waning influence of logging in eastern Oregon economies. Some lumber mills in eastern Oregon have re-tooled to handle small trees or to produce particle board instead of mature and large tree lumber.

Even under the “Forest Vegetation Specific Purpose and Need”, the scoping text represents a generalized rubber-stamping exercise for logging. There is no explanation of how and the specific Clarks sale forest area and individual stands have departed from HRV. The “conditions for uncharacteristic severity of disturbance” also remain undefined. There are no site-specific conditions described that would increase “uncharacteristic severity of disturbance” (also undefined) except possibly any unusual density of small trees due to past logging and/or fire suppression. “Uncharacteristic” disturbance is certainly an over-used rationale for repeated logging. Extreme climate change by definition creates “uncharacteristic severity” of disturbances, including more intense wildfire (which is also fueled by the effects of past logging), as well as more prolonged drought, unprecedented high ambient temperatures around the world, and more severe storms, with unpredictable weather patterns. Extreme climate change threats to forest ecosystems and biodiversity are being used to rationalize further damage to forest ecosystems from timber sales just when forest ecosystems and wildlife species most need protection from human-caused extraction and degradation in order to survive global warming. This can be seen in the stock biased analysis of climate change in the Forest Service’s Eastern Oregon Environmental Assessments (EAs) and Environmental Impact Statements (EISs) that read as if timber industry lobbyists wrote it.

Arguably, as the scoping letter admits, past logging practices “have resulted in the departure of HRV” assumed, or more precisely, in the unnatural degradation of the forests from the creation of homogenous, virtually biologically sterile plantations from reduction of tree species diversity and plant diversity and subsequent loss of wildlife species diversity. Soils, plant composition, and water quality have long-term degradation impacts from both timber sales and livestock grazing—both key root causes of unhealthy forest conditions, along with wildfire suppression. The restoration answer to the existing conditions is not repeating more logging, livestock grazing, and wildfire suppression that caused these problematic unnatural conditions on the ground. Instead, small tree non-commercial thinning by hand where small tree density is at unnatural levels for the forest type, soil type, and topographic aspects could be used along with prescribed fire in lower elevation dry forest types only, and by managing wild fires rather than suppressing them as much as possible. Removing mature and large trees just exacerbates existing problems, such as alteration or loss of wildlife habitat, removal of forest structural complexity and fire resilience, loss of biodiversity, loss of natural levels of biomass and soil productivity, and more extreme climate change effects.

There is no explanation of the nature of the presumed “departure between the current conditions of the area [which are not disclosed] and the desired future conditions.” Nor is there any justification for the “desired future conditions”, which seems to be a “one size fits all” paradigm conducive to approving more logging. For example, logging is the primary means being used to reduce assumed “high stand densities” when tree densities can be quite variable across the area, based on effects of previous logging, soil type, proximity of water, slope aspect, and elevation. How would “forest health” (which is used by the Forest Service to denote individual tree vigor and growth for tree farm-style logging) be improved when there hasn’t been time since the last timber sale for remaining trees to have grown significantly or where soil type and/or slope aspect and elevation limit dense tree growth? Further, the forest thins itself through natural disturbances and is not dependent on Forest Service management. All the “Forest

Vegetation Specific Purpose and Need” bullet points are generalized formulas for promoting logging to the public without disclosing actual forest conditions on the ground.

Of course trees compete with each other to some degree for water, sunlight, and nutrients. This is not a cause for alarm or for management. Insects and disease are natural disturbances that thin the forest without the unnatural impacts of logging.

As for improving resilience to “disturbance” (undefined) by favoring “fire resistant tree species”, this is flawed logic, since the District plans to log mature trees of all species up to 21” dbh and large trees that are the most fire resistant size class, regardless of tree species. The Forest Service ignores the well-established greater resistance of large trees to fire while promoting timber industry preferred tree species—Ponderosa pine and Western larch--as the most fire resistant tree species. Yet the Forest Service is still planning to log both species up to 21” dbh, ensuring that most of the Ponderosa pine and larch will be logged before reaching a protected (and more fire resistant) large size.

It is also highly convenient for repeating destructive logging to automatically assume that reducing tree densities is needed (apparently no matter what the existing forest conditions are) and reducing multi-story stand structures is needed (even though multistory canopies are natural for mixed conifer stands and especially in moister mixed conifer stands), “to improve resilience to disturbance.” Yet there is no indication as to how much the stands are already resilient to disturbance. Logging is highly stressful to forest resilience since it is an unnatural disturbance. If these forest stands were logged in the past, they are likely still recovering from the past logging, which could explain any weakened resilience to disturbance in the logged stands. Again, logging is not a solution, but it’s the main focus in these enormous timber sales.

We are concerned that reducing tree density on a landscape scale could eliminate suitable nesting and foraging habitat for Northern goshawk and Cooper’s hawk, critical elk and deer security habitat, abundant down and elevated logs for American marten foraging habitat, the higher canopy levels needed by Pileated woodpecker and Northern goshawk (60% canopy closure for nesting and a minimum of 40% for foraging for both species, along with other wildlife species whose habitat needs are represented by Management Indicator species, including Pileated woodpecker, American marten, Rocky Mountain elk, and Northern goshawk.

We are also deeply concerned by the planned reduction of multistory stand structures, which are needed by many Neotropical Migratory songbirds and Birds of Conservation Concern, as well as by wildlife species needing greater canopy closure, such as marten.

As for the purpose and need “to reduce susceptibility to wildfire within the landscape”, this is again over-generalized, as naturally drier forest types such as Ponderosa pine dominant stands and dry Ponderosa pine/Douglas fir stands evolved with more frequent, less severe wildfire, but they would also have patches of some stand replacement fire intensity, based on the full range of current best available science. Wildfire is a natural disturbance. The goal should not be to reduce the “susceptibility” to wildfire across the landscape, but immediately around residential communities, in a legitimate Wildland-Urban Interface zone, not in the back country. Further, higher elevation mixed conifer forest types tend to retain more moisture and more fire resilience due to higher levels of precipitation and longer snow pack retention. Higher elevation mixed conifer forest types don’t have to be as fire resistant, as wild fires burn far less frequently (e.g. often in a range of 100-250 years, as opposed to a range of fire intervals of 10-35 years on low elevation, drier forest types near dry grass lands. Thus the higher elevations tend to have more productive forest with naturally denser stands, often dominated in late succession by Grand fir and other shade tolerant species.

The more covert goal of the Forest Service is to eradicate as much Grand fir as possible since it is not a timber industry-preferred tree species, as well as potential heavy logging of Douglas fir. This is apparently planned for the Clarks sale, as the estimated 12,238 acres of Individual Tree Selection (HSL) logging is defined as follows: “Under this prescription, trees would be removed from all crown classes favoring shade tolerant fire-resistant tree species. Tree density would be reduced to the Lower Level of the Stand Density Index Management Zone. This density level represents the lowest level of full stocking.” Clearcutting or virtual clearcutting, such as “Seed tree” cutting and “Shelterwood” cutting, is now called “Regeneration (REG), which is described for the Clarks sale as: “This prescription is selected in stands of nearly pure shade tolerant tree species. Most of these trees would be removed while retaining any viable shade intolerants. Reforestation would be required. The sites would be underburned for site preparation and either planted or put into natural regeneration status.” This virtual clearcutting would evidently remove all or most firs and any other tree species deemed to be shade tolerant, which would represent typical tree species biodiversity in moist mixed conifer. This old school forestry eradication of shade tolerant tree species apparently would be used to convert naturally moist mixed conifer to dry forest-associated tree species or Western larch. This “Regeneration” clearcutting would take place over an estimated 1,533 acres. These two logging methods would dwarf the 4,909 acres of typical commercial thinning that removes trees from the lower crown classes, although commercial thinning would also reduce density level to “the lowest level of full stocking.” These definitions and estimated acreages for the “Silviculture Prescriptions for the Proposed Action” for the Clarks Integrated Vegetation Management project were provided to me by the silviculturist upon my request to explain the various acronyms for proposed logging methods on the Clarks sale map.

From our point of view, mass removal of shade tolerant tree species and conversion on a landscape scale to mostly shade intolerant species is misguided, disrupting the natural development of denser, multi-storied mixed conifer forest where it would naturally occur, at the expense of plant, tree, and wildlife species that evolved with far less frequent fire which usually burned at mixed to stand replacement intensity. Higher severity fire still creates a mosaic across the landscape with patches of denser green live forest remaining and fire-created open meadows, and other openings with large snags and logs for wildlife. This creates ideal habitat for elk and many other fire-adapted wildlife species, such as Blackbacked woodpecker, Lewis’ woodpecker, Black bear, and often, Pileated woodpecker, as well as American marten. Canada lynx also benefit from high elevation stand replacement intensity wild fires for winter foraging habitat, with their Snowshoe hare prey depending on young Lodgepole pines that regenerate after high elevation fires. We are concerned by the negative impacts to these and other wildlife species from heavy logging to the point of virtual clearcutting on a landscape scale and removing most shade intolerant trees even where they are a natural major component of the stands. Wildlife species that would be negatively affected include Sensitive and Threatened species and Management Indicator species, including Threatened Canada lynx; Vulnerable ranked (for Oregon) and MIS American marten; MIS Blackbacked woodpecker; Sensitive and MIS Williamson’s sapsucker; MIS Pileated woodpecker; MIS Rocky Mountain elk; and Great Gray owl, a focal species that depends on large trees and forest at moist meadow edges, usually at higher elevations with moist mixed conifer.

The National Forest Management Act requires that the viability of Management Indicator species be protected, yet the Forest Service seems not to care about the fate of wildlife species requiring denser forests, multi-story stands, forest structural complexity, a diversity of tree species, and moist mixed conifer forest at higher elevation and North or Northeast/Northwest-facing slopes, and/or in riparian areas and hollows—especially with ash soil types. Our perception of this attitude is based on the stated management objectives.

Moist and cold forest types should not be targeted for fire risk reduction, tree density reduction, and reduction of multi-story and complex stand structures, based on the science and wildlife habitat requirements for moist and cold mixed conifer forest types.

When determining how moist a mixed conifer stand would naturally be, it's important to assess what it used to be, prior to past logging. This can be based on evidence of old growth fir, including Grand fir—old growth live trees, snags, and logs, and representation in regeneration of shade tolerant tree species' seedlings and saplings. Sometimes heavy logging has opened and dried out the stands so much as to lose the plant community type or the Plant Association Group's moistest indicators. These include Queen's Cup Bead lily, Twin flower, and Grouse huckleberry. Remnant individuals of these plant species may be important for identifying natural plant associations for heavily logged stands.

"Declining landscape diversity", as described on Scoping p. 2, indicates the effects of past logging and tree planting, which should not be replicated. After extensive clearcutting or other heavy logging, planting likely took place, as well as natural regeneration, resulting in less forest openings and stand initiation stages—which are usually created by wildfire. Multi-story forest stands becoming more common indicate regrowth in openings after past logging and possibly, suppression of wildfire.

What is the evidence for the Clarks area historically having more old forest single stratum structure and less multi-story structure? Single stratum forest is likely more typical historically for Ponderosa pine stands and for Western larch after stand replacement severity fire. Past targeted heavy logging of old growth Ponderosa pine and Western larch is likely accountable for less single stratum old growth. More logging of large trees and mature overstory won't help, but would perpetuate the loss of single stratum old growth and future large and old trees. Logging does not magically create more single stratum old growth by logging multistory old growth. There would still be less old growth structure overall, including future old growth live trees, snags and logs lost to heavy mature logging, as well as planned removal of remaining large trees.

With extreme climate change effects already happening, and already having passed multiple tipping points and earlier worst case scenarios predicted as long ago as 1990, mature forest cover and large and/or old trees need to be prioritized in order to retain and increase badly needed forest carbon sequestration and storage. Commercial logging needs to give way to forest protection, which does not mean logging to favor only the most fire resistant tree species or to open up stands too much and drying out the forest on a landscape scale. Commercial logging itself reduces fire resiliency and resiliency to insects and disease, often increasing the intensity of wild fire by removing more resistant mature and large trees. Commercial logging also decreases forest resiliency to insects and disease by simplifying tree species composition through eliminating the mosaic pattern of interspersed different tree species, allowing tree species-specific insects and disease to spread further through homogenous stands.

Resilience level to disturbance should not be the only indicator of which tree species to retain or remove by logging. For instance, in the Forest Service's long-standing desire to eradicate Grand fir (since at least 1910, based on historical documents), several valuable features of Grand fir have been ignored by the agency that provide for wildlife habitat requirements and moisture retention. These include Grand fir's tendency to rot in the trunk, providing abundant snags and logs on a regular basis, which are preferentially selected for foraging by Pileated woodpeckers and Black bears. Grand fir also provide big interior cavities for Pacific fisher to use for denning, as well as for other species such as Vaux's swift. Grand fir also has the ability to survive after dropping of all their needles, appearing to be snags, then after one wet winter, to re-establish full green crowns on fully live trees, due to their ability to store water in their roots. This seems like a critical adaptation to survive prolonged droughts as these increase under

extreme climate change. Grand fir also provide cavities under their base between roots that collect snowmelt and rain water below the tree in pools that may last all summer to provide drinking water to small mammals, reptiles, and amphibians. These are survival characteristics that other tree species don't usually possess, which are vital to supporting biodiversity during global warming.

I have witnessed many live old growth and mature Grand firs and Englemann spruce that bear long and deep lightning scars, yet remain live trees with full green crowns. Moist mixed conifer forest retains so much moisture that while subject to more lightning strikes on high elevation ridgelines, the moister forest still has far less frequent wild fires than lower elevation dry forest.

Most large and old growth Grand fir, like other tree species, also acquire thicker bark at the base of the trunk and higher live crowns with fewer low branches, demonstrating large tree resistance to fire.

Diversity of tree species is vital to forests surviving global warming. A variety of tree species mixed in stands helps to ensure that one species-specific defoliating insect or disease-specific disease does not wipe out entire stands.

Re: Table 2 on p. 3: There is no citation of what historical evidence was used to determine departures from an assumed HRV based on pre-European baseline information. What type of evidence was used, from what year(s), and exactly what locations, compared to the Clarks project area location? What were the protocols and scope of the surveys? How many historical photos from what exact locations and years were used?

Somehow, most of the HRV analysis results in most Scoping, EAs, and EISes for timber sales showing approximately similar results that are used to indicate an assumed need for more logging—to reduce tree density, reduce late seral tree species, and reduce associated multi-layer canopy, apparently regardless of there often being higher elevations, North slope aspects, ash soils, or proximity to water where “late seral” tree species (e.g. Grand fir and other moist mixed conifer tree species such as Englemann spruce and Subalpine fir) would be expected to grow. Without any specific evidence cited, based on the conditions of the project/timber sale's location, the results are hard to believe, as they are used in almost every timber sale HRV analysis to justify commercial logging, as if the entire Blue Mountains forests had only open Ponderosa pine stands historically. The HRV analysis usually also ignores the effects of past commercial logging that may be causing the undesirable outcomes.

Re: the “Summary of Vegetation Conditions Relative to HRV”: Why would late seral tree species be considered above HRV in Moist Upland Forest and early seral species be considered below HRV, when moist mixed conifer upland forest is typified in the science as naturally having “late seral” tree species like Grand fir as the dominant overstory and climax successional stage species? Of course there wouldn't be as many “early seral” tree species such as Ponderosa pine in the moister conditions of the moist mixed conifer forest.

Past logging is the most likely cause of the understory re-initiation structure stage being “well above desired conditions across all three PVGs” unless there was a recent stand replacement fire. (PVGs are Potential Vegetation Groups.) More commercial logging would only increase the Understory Re-initiation stage across the timber sale area. (See Scoping p. 4, par. 2) Likewise, “the loss of early seral, shade tolerant species” was likely caused by past logging. More logging of mature Ponderosa pine and Western larch won't help the situation. Continued logging of mature Ponderosa pine and Western larch up to 21” dbh would perpetuate the loss of these tree species into the future, yet it is a likely outcome of the Clarks sale.

Past logging is also likely responsible for the fragmentation of “old forest habitat types”, not just an ambiguous “departure of forest structure stages and abundance of multi-canopy conditions” as stated.

The “Insects and Disease” section of the scoping letter on p. 4 represents inaccurate use of the science through broad generalizations and lack of specificity as to differences between forest types affecting moisture stress-related inter-tree competition and drought effects. Further, this section fails to clarify whether the defoliating insects named and mistletoe infections are at endemic or epidemic levels.

Further, there is no qualifying statement that these are native defoliating insects and mistletoe species specific to particular tree species and that both defoliating insects and mistletoe play critical roles in the forest ecosystem. These roles include thinning stands and creating openings naturally. Mistletoe brooms provide food for bird species and the Johnson Hairstreak butterfly and also provide nesting platforms for Northern goshawk and roosting security for Blue grouse. The defoliating insects are primary food sources for woodpeckers and other birds.

Defoliating insects and mistletoe are normal at endemic levels, and periodically grow to cyclical epidemic outbreaks, such as the Spruce budworm outbreak in the Umatilla National Forest in 1992, which is part of a natural cycle for Spruce budworm.

There is also no admission that both defoliating insects at epidemic levels and increased incidence of mistletoe can both be exacerbated by commercial logging. Commercial logging is noted in the science to spread both mistletoe and root disease. Defoliating insect outbreaks can be increased to epidemic levels and mistletoe incidence can increase due to logging creating dense re-growth of one tree species over a large area, as with past logging fueling the 1992 Umatilla Spruce budworm epidemic and the Pine butterfly outbreak on the Malheur National Forest some years ago in the southern Malheur. Thus commercial logging, a major root cause of insect and disease epidemic increase is being proposed for resolution of the problem.

Re: the “Riparian Vegetation” section:

Commercial logging has also contributed to the effects of fire exclusion or suppression. How is it known that fire regimes between 1650 to 1900 were uniformly or mostly low severity fires, as claimed? There is increasing scientific evidence of mixed severity and high severity burns historically even in Ponderosa pine dominated forest. There have been huge wildfires in the past, such as the well documented epic 1910 wild fire that crossed multiple state lines—well before there was any large scale effective fire suppression. These were often stand replacement severity fires, including the 1910 fire. What is the evidence for the assumption of mostly low severity fire for the period of 1650 -1900 as a Historical Range of Variability baseline? What types of evidence, from what exact geographic locations, and from what dates, were used for the assumption of low severity fire being dominant from 1650 to 1900? We request this information.

Re: the Proposed Action section:

Non-commercial thinning less than 9” dbh would likely take care of most of any excess density in many of the stands currently slated for commercial logging. Moist mixed conifer stands should be left with more small young trees, as these are more productive and naturally dense stands. Hiding cover patches should be retained throughout commercial sale units for elk and deer, with an emphasis on retaining patches of diverse tree species in areas needing more hiding cover or tree age diversity.

Commercial logging should be scaled down substantially to allow for landscape scale diversity, retention of all old growth habitat and all large trees, and for retention of the best wildlife habitat based on

existing wildlife use, wildlife corridors, and retention of intact Riparian Habitat Conservation Areas. The emphasis of any commercial thinning should be on thinning young plantations to diversify them, with up to one acre openings and with retention of natural tree species composition regeneration, not planting.

Any areas never logged before should not be logged, as there are hardly any areas in National Forests left to provide reference conditions to use for planning adaptive management practices and to provide high quality natural habitat conditions for wildlife. No Old Growth Preserves should be logged, as these were reserved to preserve old growth habitat—at least at 5% of the District, which is minimal, and nonetheless is not being met on the Whitman Ranger District. No RHCAs should be logged, as commercial logging and tree removal degrades riparian functioning, reduces biodiversity, and threatens the viability of fish populations. Logging should also be avoided for popular recreational sites and gathering places such as dispersed camp sites, which are often used by generations of family members. Winter range should not be commercially logged in order to provide sufficient thermal cover from severe winter storms—which are increasing in severity due to climate change. Summer range should have more tree retention to provide hiding cover and thermal cover to protect deer, elk, and other species from record-breaking heat waves and prolonged droughts through shading and moisture retention. Hiding cover is also critical, since Mule deer are in sharp decline and elk are sensitive to human disturbance.

All proposed steep slope logging should be cancelled. Most of those sale units, based on our extensive field surveying across the Blue Mountains Forests, are not economical to log based on there now being mostly only small trees from past logging or few standing mature and large trees due to the steep slopes. Cable yarding and helicopter logging would be far too expensive, given this context. Steep slope logging also poses the most negative impacts to RHCAs and fish habitat due to easily displaced fine sediment entering streams, loss of large tree structure recruitment to streams as logs for pool creation over time, and loss of live trees, snags, and logs stabilizing the slopes into the future. On many steep slopes slated for logging, such as in the proposed Morgan Nesbit timber sale on the Wallowa-Whitman National Forest, the trees are often bowed uphill to compensate for slope movement, indicating landslide risk.

The “tethered logging system” could be extremely dangerous for loggers and would pose all the same degradation impacts to riparian ecosystem functioning and prevent attainment of riparian management objectives under INFISH and PACFISH as cable yarding.

We are strongly opposed to both steep slope logging and logging within RHCAs.

Reducing crown fire potential through commercial logging removal of overstory canopy is a fool’s errand, as this approach is the least effective option for fire risk reduction compared to small tree non-commercial thinning, “ladder fuel” removal of small trees under large and old trees, and use of prescribed fire. Further removing mature and large trees to reduce crown fire potential is like cutting off your nose to spite your face—that is, removal of what you are claiming to save. In the process, needed shading related to cooling and moisture retention is lost to canopy reduction. Removing the more fire resistant mature and large trees paves the way for dense in-growth of small, highly flammable trees.

Re: the “Riparian Restoration Treatments” section:

Drop all commercial size logging and felling in the nine riparian sale units, over all 880 acres.

Riparian hardwoods could be restored by non-commercial thinning of small trees up to 9” dbh where they are clearly out-competing hardwoods and by using prescribed fire—only in dry forest types, by allowing fire to back into RHCAs, not be ignited within the RHCAs. Native riparian hardwoods from

local sources could then be planted in hardwood gaps if necessary. Livestock should be effectively excluded from all RHCAs.

Conifer encroachment, where it exists, is a symptom, not a root cause of riparian hardwood decline, whereas livestock access and water diversions, as well as droughts, are root causes.

There should be no reductions in RHCA “no logging” buffers as planned and stated. INFISH and PACFISH have not been amended to allow for commercial logging within RHCAs. The science behind INFISH and PACFISH is well established and still sound. Logging in RHCAs is just a timber grab, not “riparian restoration.” The greatly diminished or absent riparian buffers proposed would not effectively prevent sedimentation of streams, loss of shade to cool stream water, loss of bank stability, loss of moisture retention within the drainage, and loss of Redband trout, which are listed as Sensitive and declining.

Commercial logging impacts to streams, fish, and other aquatic and riparian-associated wildlife species are well documented in the science. We are concerned that the Wallowa-Whitman National Forest’s trend toward continuing to log in RHCAs must be legally stopped. The cumulative impacts of commercial logging in RHCAs could threaten the viability of MIS and Sensitive Redband trout; Sensitive Columbia Spotted frog; any salamander species; aquatic macroinvertebrates; and the potential for Bull trout, Mid-Columbia Steelhead trout, and salmon recovery and persistence where they still exist.

Commercial logging in RHCAs also threatens water quality, water temperatures low enough for fish species’ recovery, riparian plant viability and diversity, and achievement of Riparian Management objectives.

We are already deeply concerned by the impacts to the RHCAs and aquatic life where commercial logging and road construction would take place in the Patrick timber sale.

Re: the “Forest Plan/Eastside Screens Amendment” section:

We are strongly opposed to the Eastside Screens amendment that would unleash a barrage of unrestrained large (and inevitably old) tree logging. We have already seen the results of when large tree logging was allowed up until the 1995 passage of the Eastside Screens. At current levels of large tree structure of only 3% of the Blue Mountains National Forests, based on David Mildrexler’s study, there is a huge deficit in large tree structure compared to historic conditions. With renewed large tree logging, the deficit would increase for large trees for wildlife habitat, riparian restoration and fish habitat, critical carbon sequestration and storage to reduce climate change effects, and recreational values.

What analysis was there for the Eastside Screens Amendment? There was no evident science backing the decision to allow a return to large tree logging. There was only a deficient EA for the decision, which should have been an Environmental Impact Statement, since it is a programmatic decision that covers six National Forests. The public process was done only by Zoom meetings during the Covid pandemic, with scientists giving testimony against the amendment being cut out of the following Zoom meetings. This is a clear case of bias on the part of the Forest Service. The Screens amendment decision was based on an inadequate and rushed public process with little public awareness across eastern Oregon and Southeastern Washington, and no apparent outreach to local residents or the wide spectrum of recreationists using these National Forests. The final decision was rushed so as to be signed while Trump was still in power. We are already litigating the Eastside Screens amendment to log large trees ≥ 21 ” dbh and up to 30” dbh and larger for Grand fir, under only a voluntary guideline instead of an enforceable legal standard. So far

the similar litigation brought by multiple environmental protection groups has received a favorable response by the Magistrate, who sided with the plaintiffs on three key claims.

Replacement of the legal standard for limiting logging to up to 21" dbh by a voluntary guideline ensures that large trees would be removed at a rapid pace with little or no restraint. Old growth would be relegated to small historic patches--museum pieces--as most trees 21" dbh and larger already have old growth characteristics. Further, large trees are next in line to become old growth, so logging large trees again will result in rapid elimination of future old growth development.

Forest Service staff should be ashamed of this reversal in policy and legal standards, including violation of Forest Plan goals and guidelines to retain and increase large and old trees and old growth forest on a landscape scale.

The amendment decision would contribute to the uplisting and extirpation of many wildlife species dependent on large tree structure abundance, including MIS Pileated woodpecker; MIS American marten; Sensitive-listed Lewis' woodpecker; MIS Northern Flicker; MIS Williamson's sapsucker; and MIS and Sensitive-listed White-headed woodpecker. Northern goshawk, which is a Management Indicator species for most of the Blue Mountains Forests, would lose suitable nesting platforms from large Douglas fir mistletoe brooms and large Ponderosa pine branches, and Great Gray owl, a focal species, would lose suitable nesting platforms from large broken top Grand fir snags. Secondary users of primary cavity excavating woodpeckers' nest, roosting, and foraging cavities would also be harmed through loss of large tree structure.

The Eastside Screens amendment would also harm fish habitat through loss of large log recruitment to create pools that provide summer refugia habitat and cool the stream water to suitable temperatures for fish species. Fish species affected negatively include Threatened Bull trout and salmon species, Threatened Mid-Columbia Steelhead trout, and Sensitive-listed Redband trout and Malheur Mottled sculpin.

Other aquatic and riparian-associated wildlife species would be harmed through loss of multistory canopy; loss of large tree structure—live, snags, and logs; and loss of moisture retention through large tree and multilayer canopy shading. These wildlife species include Neotropical migratory songbirds such as the Yellow warbler and Wilson's warbler; salamander species; Sensitive-listed Columbia spotted frog; Western ridged mussel and other Sensitive mussel species; and aquatic macroinvertebrates, which are critical prey for fish and frogs.

The amendment to the 21" dbh limit for logging may not withstand legal scrutiny. It certainly is unethical and contrary to a broad consensus of current best available science.

The current federal administration is being petitioned by environmental organizations (including ours) and scientists for broad federal protection of mature forest and large and old trees in order to attain 30% protection of public lands by 2030 and 50% by 2050 to achieve climate goals. It would be impossible to meet these goals without full protection of forest and ocean carbon sinks.

Specific to the Clarks timber sale, the rationales given for large tree logging are so all encompassing as to allow logging of almost all large (and inevitably, old) trees in the project area. There are so many situations that would allow for large tree logging that any promise of restraint is hypocritical and likely to be violated. For example: "Harvest of trees greater than 21" dbh would only take place when deemed necessary to meet objectives associated with stocking levels, species composition, stand structure, insect and disease issues, or overall forest health" which includes virtually any situation on the ground. The

Scoping letter goes on to make these situations allowing for large tree removal completely subjective: “Trees within these larger size classes would only be harvested when the activity improves forest health and enhances stand development toward sustainable old forest conditions.” (Both quotes are from Scoping, p. 6) “Forest health” remains undefined, along with what enhances stand development toward “sustainable” old forest conditions.

The situations under which large tree logging would be allowed to take place are so broadly applicable and subjective that marking staff and loggers are likely not to consider the only qualifier: “If there are not enough old trees to develop late and old structure conditions, large trees shall be retained at a level that promotes these conditions.” Even this qualifier can be interpreted highly subjectively. There are no requirements that are quantified to preserve late and old structure. There are also no concrete examples of when large trees would not be logged—only all-inclusive examples of when subjective opinions could be used to allow logging large trees.

How would logging large trees improve “forest health” when there are so few large trees left compared to historic and pre-European baseline conditions? How would large tree removal enhance “stand development toward sustainable old forest conditions”? This is nonsense, not science.

Late and old forest structure and old growth are defined by the number of live large trees per acre plus large snags and logs. This can only be seen as a prescription to eliminate old growth forest and large trees over time, replacing them with even-aged plantations or just young timber industry-preferred tree species. Ecologically, this equates to forest liquidation, not promoting “enough old trees to develop late and old structure conditions” as promised in the Scoping letter (p. 6, 1st par.). Thus even the minimal requirements in the Eastside Screens amendment are being ignored and dismissed. Even if followed, this weak guidance would allow only existing LOS and old growth to exist at minimal levels, losing LOS or old growth status as the few large live trees become snags and logs, no longer qualifying for LOS or old growth status to be protected. There would no longer be enough live large trees to meet the LOS or old growth definition. This would likely result in no holds barred large tree logging on a landscape scale, eliminating the development of future LOS and old growth habitat, even though the Blue Mountains Forest Plans still set the goal of retaining and increasing large trees and old growth.

Re: Commercial Treatment [i.e. logging] within Old Forest Structure”:

We are opposed to logging up to 21” dbh or logging any large trees over 21” dbh in existing old forest structure, as that would be a management plan that would eliminate old forest over time. We are opposed to converting old forest multi-strata canopy to single stratum when this removes mature trees in the next size class that would otherwise become large trees (15-21” dbh).

Any thinning to reduce density in old forest structure should only include thinning of “dense understory trees” (up to 9” dbh), not the midstory or the overstory. Any commercial thinning in old growth structure should also be limited to truly dry forest types with Ponderosa pine dominance, not in moist or cold mixed conifer with Grand fir dominance or the presence of Englemann spruce and/or Subalpine fir.

We oppose commercial logging of moist mixed conifer and cold upland forest. Other markers of moist mixed conifer include high elevation, ash soils, and moister Plant Association Group (PAG) indicators, including Big leaf huckleberry, Grouse huckleberry, Twinflower, and Queen’s Cup Bead lily, as well as Prince’s Pine in cold forest.

Potential Forest Plan Standard violations for snags, logs, and soils:

We are opposed to felling of old growth or large snags except for legitimate hazard trees, as large and old snags should be buffered from felling and burning. Large and old growth logs also need to be buffered from biomass reduction and burning. There is likely already a deficiency in large snags and logs in this sale area compared to even weak outdated Forest Plan standards, due to past logging and rampant firewood cutting.

We are concerned that the Clarks sale will violate existing Forest Plan standards for large snags, down wood, and detrimental soil impacts from too much heavy equipment use and unregenerated skid trails, as well as soil compaction from past and planned logging.

Re: Old Forest Preservation Stands (MA 15):

We are strongly opposed to any commercial size logging in Old Forest Preservation stands. The whole scoping letter reads like a concerted plan to eliminate old growth and large trees as much as possible.

We are not opposed to non-commercial thinning up to 9" dbh in the 309 acres of existing large/old Ponderosa pine stands and the careful use of prescribed fire, while buffering the large and old Ponderosa pines. If there are other species of large or old trees in these stands, that is an indicator that these were not historically solely dry old growth Ponderosa pine, but mixed conifer. No large trees or trees with old growth characteristics or complex structure should be felled or removed.

Re: "Whitebark Pine Management":

"Treatment need" and specific "management actions" for Whitebark pine remain undefined, which makes it impossible to know whether we would support the management or not. How would management actions "maintain or increase the quantity and distribution" of Whitebark pine? Elements of the restoration strategy cited for Whitebark pine could have been disclosed so that the public could at least know the range of potential management actions under consideration. Are there any Whitebark pine in this project area? Please let us know where there are Whitebark pine so we can see the existing conditions where they are located. We are opposed to commercial logging around Whitebark pine, as Whitebark pine evolved with other tree species and typically occupies relatively open subalpine sites. Noncommercial thinning up to 9" dbh around the Whitebark pine and possible pruning of lower tree limbs shading out Whitebark pine could be acceptable. Please send us a hard copy of "A Range-wide Restoration Strategy for Whitebark pine" (USDA Forest Service 2012) by mail so we can know more about specific restoration management actions proposed and their effectiveness.

Re: "Defensible Fuel Profile Zones:

We are very concerned by the so-called "Defensible Fuel Profile Zones" after seeing them implemented on the Umatilla National Forest, where they were 100 foot clearcuts on either side of the roads with no intact plants or trees and lots of slash. This was done under a Categorical Exclusion, through which the Forest Service must have violated Forest Plan scenic view or "viewshed" standards. The transformation was shocking and likely off-putting to recreationists. DFPZs are almost guaranteed to not be effective at reducing fire risk, fire intensity, and fire spread. The likelihood of these biomass removal zones being effective is extremely small statistically—especially in high elevation forest the is subject to infrequent stand replacement severity fire that might not occur for another 50-100 years in that particular area. There is a study showing that the statistic probability of any "fuel" reduction being effective in reducing fire risk or extent is extremely low, as the effects of biomass reduction only last for up to 10 to 15 years—and likely less in moist, productive forest at high elevations. Given that extreme climate change-driven fires are virtually unstoppable and send embers across wide rivers (e.g. the McKenzie River and the

Columbia River), it makes far more sense to focus fire risk reduction efforts immediately adjacent to residential communities that can qualify as “urban”. Commercial logging can dry out forest stands and leave behind significant highly flammable slash as well as in-growth of more flammable dense small tree thickets. We suggest instead only non-commercial thinning immediately adjacent to only major access roads, along with prescribed burning only in dry forest types dominated by Ponderosa pine, with potential pruning of lower limbs of mature trees immediately adjacent to the major access roads—or take no action at all, given the extremely low probability of this management still being effective whenever the next fire occurs in the same area. We are strongly opposed to huge DFP zones proposed by the Forest Service of 100 to 1,000 feet. Large DFP zones would likely eliminate all the forest between roads that is within that area. DFP zones also make the area drier and leaves residual slash and small tree re-growth that would be much more flammable than the original site’s condition.

Re: Prescribed Burning:

In general, we favor prescribed burning and allowing managed fires to burn over logging. We are opposed to prescribed burning in moister mixed conifer forest, as prescribed burning was designed to mimic low intensity, frequent fire in low elevation dry forests, not to mimic stand replacement severity, infrequent fire natural to high elevation moist mixed conifer forest types, with which associated wildlife species evolved. Prescribed fire can destroy key habitat elements for Pileated woodpeckers (soft snags and logs for foraging and large snags for nesting) and for American marten (abundant down and elevated wood for winter foraging and large snags for denning in Pileated nest holes.) Both are Management Indicator Species representing the habitat requirements for many other species using the same habitat. We advocate for buffering large snags, logs, and live trees from logging and prescribed burning effects.

Re: “Mechanical Slash/debris Treatment”:

What are the “desired” levels for slash and woody debris? Forest Plan standards for down wood should be followed, along with updated science, to ensure sufficient down wood for small mammals, birds, reptiles, and soil nutrient cycling, moisture retention, and soil carbon storage. It is likely that the Forest Plan standards are outdated and insufficient to preserve natural levels of down wood, as never logged forest usually has far more snags and down wood than Forest Plan standards require.

Re: “Maintenance of DFPZs”:

We find it highly unlikely that prescribed burning or other maintenance methods would actually occur every 0-15 years, as there is usually no guaranteed funding for such maintenance and prescribed burning is typically backlogged due to weather constraints, public health concerns regarding smoke inhalation, and lack of funding. Further, it is not natural or desirable to perpetuate scorched earth conditions, when natural wild fire occurs based on natural conditions and human-caused fire is increasing near urban areas. There will be more than enough fire under extreme climate change, regardless of biomass reduction and maintenance.

Re: “Harvest Systems”:

As discussed before, we are strongly opposed to logging on steep slopes. 76 million board feet taken off 18,819 acres in this sale area is horribly excessive, substantiating our concerns that this sale amounts to incremental forest liquidation on a landscape scale. It would be very difficult for the Clarks area to recover from so much logging. This is a reversion to “business as usual” logging practices that caused so much long-term degradation from the past, much of which is still evident after decades.

Re: Roads:

We support there being no new system road construction. We strongly oppose the re-opening of closed roads that have not been maintained for seasonal use. We are also strongly opposed to any construction of so-called “temporary” roads that are usually never fully decommissioned, becoming de facto system roads. “Temporary” roads and re-opened closed roads provide access to ATVs, livestock, introduction and dispersal of exotic invasive plants, fur trapping, and illegal firewood logging. We are opposed to re-opening closed roads and then putting them into “storage” for future use, rather than honoring past reasons for road closures. Reasons for closing roads include providing for wildlife security; stopping sediment flows from hydrologically connected roads to streams; stopping erosion from roads on steep slopes; meeting Forest Plan standards for road density; and stopping illegal uses of roads such as illegal firewood cutting or cross-country ATV use. Roads have also been closed due to redundancy or bad siting. Often the Forest Service has negotiated more road closures and decommissioning with forest activists, only to violate those agreements by later re-opening the closed roads and never fully decommissioning them.

The Need for an Environmental Impact Statement:

This timber sale proposal would return to very intensive logging, including extensive large tree logging, which has not been practiced for decades, and not at this scale. There would be substantial scientific controversy—especially over the large tree logging and the inevitable loss of existing and future old growth structure. Such extensive and intensive logging would result in loss of sense of place and accustomed cultural uses. Impacts to wildlife habitat would be severe and long-term. The Clarks timber sale “project” requires a full EIS.

Please keep us advised of all developments with the Clarks sale. Please send us a copy of the EA or EIS by mail as soon as it is released. We appreciate your consideration of our comments.

For the Wild,


Karen L. Coulter