



Sent via email at: objections-pnw-umpqua@usda.gov

November 6, 2023

Forest Supervisor Alice Carlton
USDA Forest Service
Attn: 2021 Wildfire Danger Tree Project
2900 NW Stewart Pkwy
Roseburg, OR 97471

Re: Objection to District Ranger David Andersen's Draft Decision Notice and Finding of No Significant Impact for the 2021 Wildfire Roadside Danger Tree Mitigation Project in the Cottage Grove, North Umpqua, Diamond Lake, and Tiller Ranger Districts of the Umpqua National Forest.

To the Objection Reviewing Officer:

Pursuant to 36 C.F.R. § 218, WildEarth Guardians (Guardians) files this objection to the U.S. Forest Service's Draft Decision Notice and Finding of No Significant Impact (DN/FONSI) for 2021 Wildfire Roadside Danger Tree Mitigation Project in the Umpqua National Forest. Guardians submitted timely comments on the draft environmental assessment (EA) on July 31, 2023 and is a proper Objector under Part 218. Pursuant to 36 C.F.R. § 218.8, Guardians hereby states that the following content of this Objection demonstrates the connections between the comments noted above for all issues raised herein, unless the issue or statement in the Draft DN and/or FONSI arose or was made apparent after the opportunity for comment closed.

WildEarth Guardians is a nonprofit conservation organization with offices in Washington, Oregon, and five other states. WildEarth 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. WildEarth Guardians and its members have specific interests in the health and resilience of public lands and waterways.

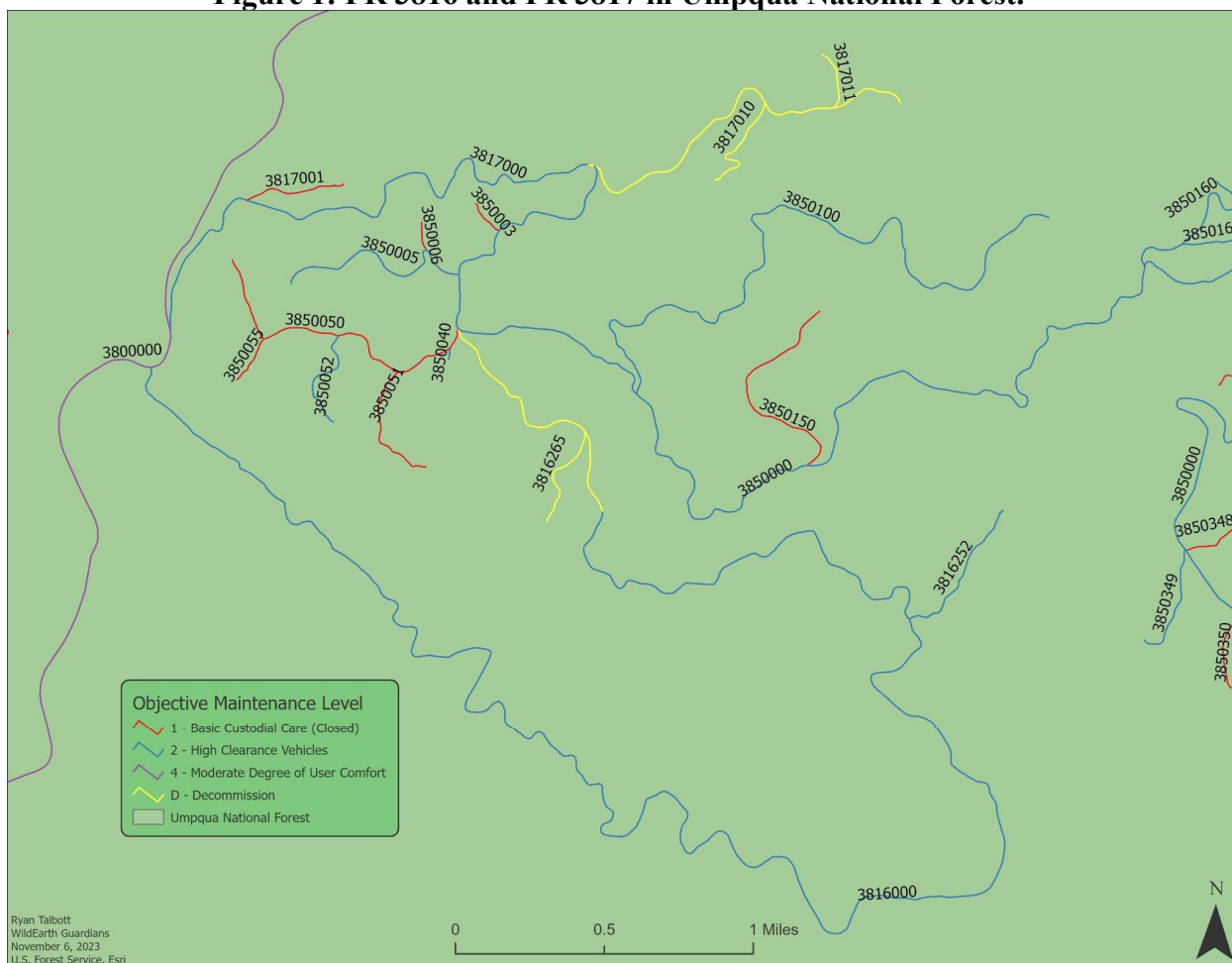
I. The Forest Service failed to adequately consider reasonable travel management-related alternatives.

Guardians requested that the Forest Service develop an alternative that considers travel-related options for closing, storing, and/or decommissioning roads instead of cutting thousands of acres of trees without any changes to the existing, extensive road system. *See* Draft EA Comments at 2-3. This is consistent with the Umpqua National Forest's Travel Analysis Report (TAR), which stated the Forest Service would emphasize reducing the environmental risks and costs of the current road system "at each future project level planning effort." TAR 26. Instead of developing

such an alternative, the Forest Service claims that “[a]ll of these roads are of high value” to the Forest Service for various purposes, including connection route, storm proofing, recreation, private land access, planting access, access to projects, survey access, and potential operational delineations (PODs). Draft DN 4-5. As we stated in our comments, we think the Forest Service has missed opportunities to right-size the road network.

For example, the Forest Service claims that it needs forest road (FR) 3817-000 because it connects FR 38 to FR 3816. *See* Final EA, A46. However, the Forest Service has set an objective to decommission part of FR 3816.

Figure 1: FR 3816 and FR 3817 in Umpqua National Forest.¹



Decommissioning this part FR 3816 would eliminate the connection between FR 3817 and FR 38. Thus, the Forest Service’s rationale that it needs FR 3817 for continued access of between FR 3816 and FR 38 does not add up in light of its existing objective for this part of the Umpqua’s road system. Also, the Forest Service set an objective to decommission at least one

¹ The roads data is from the “National Forest System Roads” geodatabase on the Forest Service’s Geodata Clearinghouse, <https://data.fs.usda.gov/geodata/edw/datasets.php>. Also, note that some roads were removed from this map to aid readability.

spur road off FR 3816 (FR 3816265) and two spur roads off FR 3817 (FR 3817010 and FR 3817011). These are missed opportunities and why it is important to include travel management in “each future project level planning effort,” TAR 26, particularly projects like this that are specifically focused on roads. Decommissioning roads that the Forest Service has already said should be decommissioned will move the agency in the direction of a more sustainable road system, environmentally and economically.

Other areas where the Forest Service should have considered decommissioning roads are just north of the Last Roadless Area (Figure 2) and in the Cavitt Creek watershed west of the Red Butte Overlook (Figure 3).

Figure 2: Roads North of the Last Roadless Area.

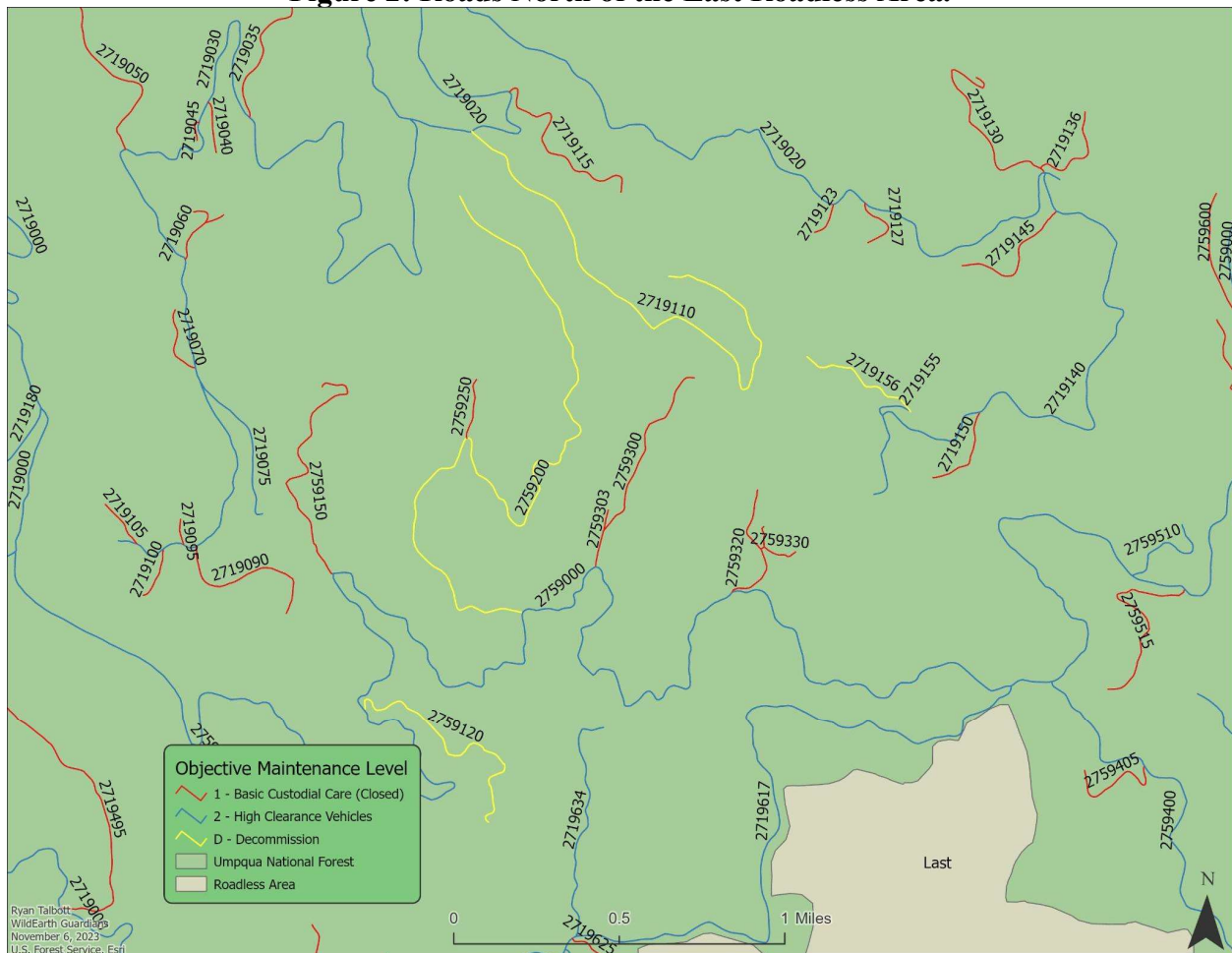
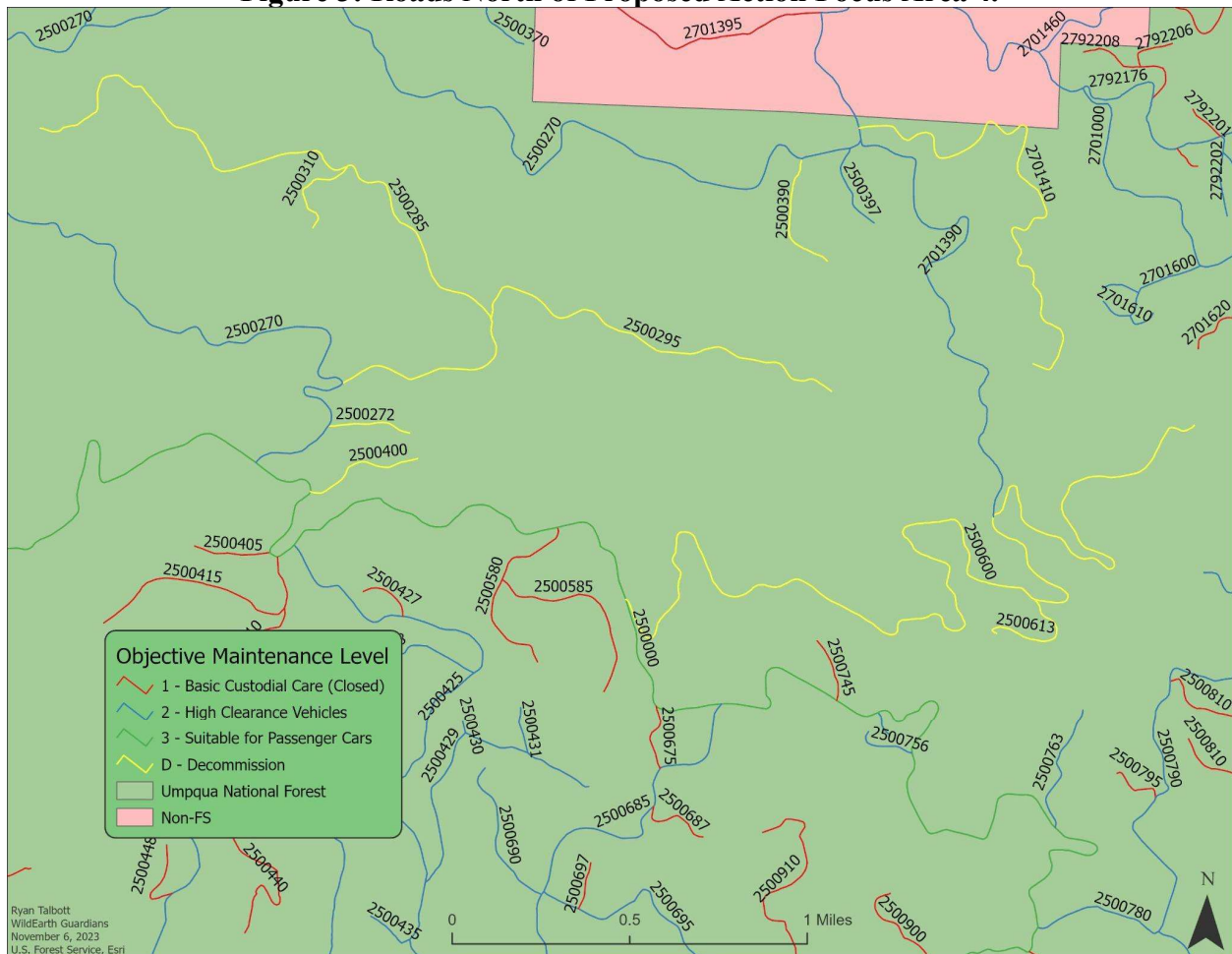


Figure 3: Roads North of Proposed Action Focus Area 4.



Again, the areas in Figures 2 and 3 are within or near the project area and the Forest Service should have considered opportunities to move the road system in the Umpqua in a more sustainable direction by including the need to decommission roads in the proposed action.

The Forest Service’s rationale for maintaining other roads also raises questions. For example, the Forest Service says that it needs to maintain FR 2813-000 because it connects FR 25 to FR 28. *See* Final EA, A39-A40. While that may be true (through first connecting to FR 2792-000), FR 25 and FR 28 are connected to the west of FR 2813-000 (through FR 2810-000, FR 2792-817, and 2792-000). The Forest Service could consider decommissioning FR 2813-000 while still maintaining access between FR 25 and FR 28 in the vicinity.

Finally, the Forest Service says that the current conditions are dangerous and limit access to forest visitors along all of the roads proposed for treatment. Final EA 135. But the vast majority of the roads proposed for treatment (nearly 78%) are ML 2 roads. *Id.* at A30. It is important to note that ML 2 roads are only open “for use by high clearance vehicles.” Final EA, A29. Traffic is normally “minor” and “use by low clearance vehicles is discouraged by signing and/or other physical indicators at the entrance” of ML 2 roads. Final EA, A29; TAR 7. Indeed, “[m]otorists

should have no expectations of being alerted to potential hazards while driving these roads.”
Final EA, A29.

We recognize that there are legitimate safety concerns at issue in this project and fully support the careful removal of hazards that have the potential to cause serious injury or worse. But when so much of the project area is along roads that are not maintained for passenger cars or user comfort and convenience, receive only “minor” use, and where there are “no expectations of being alerted to potential hazards,” then that should be given sufficient weight in the benefit-risk analysis.

Proposed Resolution: The Forest Service should prepare a revised EA that includes an alternative to decommission at least some roads in the project area in lieu of logging, particularly ML 2 roads, and to decommission other roads within or near the project area that have already been identified for decommissioning.

II. The Forest Service selectively relied on Filip 2016 in developing its Tree Selection Criteria.

According to the Forest Service, “the project must include the larger diameter Douglas firs and cedars because these dead trees are still vulnerable to disease and decay over time.” Draft DN 5. This conflicts with Filip 2016, which the Forest Service says it relied on in developing its Tree Selection Criteria for the project. *See* Final EA 18. According to Filip 2016, even after five years, large diameter Douglas fir and cedars do not have imminent-failure potential. Filip 2016 at 44.

Moreover, as stated above, nearly 78% of the roads proposed for treatment are ML 2 roads. According to Filip 2016, even for trees that have been ranked danger trees, ML 2 roads rank the lowest priority for cutting. Filip 2016 at 37. And on roads where the “duration of exposure is intermittent,” trees that have a failure-potential of “likely” are *not* considered danger trees. *Id.* at 46. ML 2 roads receive only “minor” use. As such, we question the need for so much of the project to include ML 2 roads.

Proposed Resolution: The Forest Service should prepare a revised EA that better reflects the Filip 2016 Field Guide and revise its Tree Selection Criteria accordingly. A revised EA should disclose that Filip 2016 (1) does not consider large Douglas firs and cedars as having imminent-failure potential even after 5 years of a major fire; (2) does not consider trees that a likely-failure potential to be danger trees; and (3) places ML 2 roads at the lowest priority for cutting, even if the failure potential is considered imminent.

Sincerely,



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