Blue Mountains Biodiversity Project comments summary on the

North Fork Crooked River Forest Resilience Project Draft Environmental Assessment

To: Jennifer Abernathy, NEPA Planner,
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[redacted]

*Please Note:

This typed comments summary does not include all the hand-written comments mailed to you. However, this typed version makes the comments that are hardest to read more readable, so you can skip reading the handwritten version of the following pages of comments that are fully typed or just skipping redundant comments: EA pages 1-9, and 11-17.

The typed comments below are revised to clarify our meaning, as well as add some more comments. Some of the handwritten comments that are not typed are redundant with some of the typed comments, but there are others that are not expressed in the typed version, but should be readable in the handwritten comments that were mailed separately, along with our survey sheets and photos. The handwritten comments and associated field survey sheets and photos for the North Fork Crooked River Resilience Project were mailed on November 30th, 2023, by certified return receipt.

The survey sheets and photos are designated as "North Fork Crooked River" as the surveying was done before the name of the project was finalized. We field surveyed the North Fork Crooked River project commercial sale units during bow hunting season in 2022 and in the spring of 2023, thus being able to witness conditions in the fall and spring. One round of surveying could not be identified by sale unit numbers because there were no sale unit numbers on our original draft map. However we described the location on the survey sheet headings and in some cases included photos of the map location.

We thought that the proposed timber sale project was located in the Paulina Ranger District, so that is what we wrote on the survey sheet headings. Strangely, the EA does not seem to identify which Ranger District encompasses the NFCR project. However, we were instructed to address comments to the Lookout Ranger District.

Purpose and Need for Action:

Commercial logging of mature and even large trees is not "restoration" when the area is already severely degraded from past heavy logging and over-grazing by livestock. There are very few large trees compared to historical conditions and landscape scale scarcity of even mature trees between 15 and 21" dbh. While non-commercial thinning and prescribed burning could be helpful, heavy equipment use and mature and large tree removal would decimate wildlife habitat structure, forest resiliency, and carbon sequestration and storage in the sale area.

The "need" identified on pp. 2-3 would be contradicted by the consequent conditions if commercial logging of mature and any large trees are removed by logging. Commercial logging would impair forest resilience, not improve it, by causing more soil impacts and greatly reducing forest wildlife habitat diversity—which is already badly degraded. Logging mature and large trees decreases resilience to

climate change by reducing carbon sequestration and storage. Logging and mature and large trees would reduce the already diminished moisture retention, as well as reducing habitat security for elk and deer.

*Please send me a hard copy by mail of Halofsky et al. 2019, "Climate Change Vulnerability and Adaptation in South-Central Oregon." (cited on EA p. 2)

The purpose and need statement (pp. 2-3) would best be met by non-commercial thinning by hand or by low impact equipment and by prescribed burning, not by commercial logging with heavy equipment of mature and large trees in this already extensively over-logged and cattle-damaged area, which already has very few mature forest stands and hardly any old growth habitat left due to past logging and wildfire suppression.

We agree that "past land management practices" contributed to the existing degraded condition, but planned commercial logging, removal of mature trees, extensive ground disturbance and soil impacts, re-opening of closed roads, and continued livestock grazing would repeat the mistakes and results of past management mistakes, increasing stress to the ecosystem and further reducing the resilience of large and old trees. Such repeated over-management would be contrary to the stated purpose and need.

Yes, "forested stands in this planning area have increased risk of high or moderate intensity wild fire" (EA p. 3), but that is due to the proliferation of dense, small young trees, not the scarce mature forest stands with most mature trees already widely spaced from past logging or from the almost non-existent large/old trees. The large and old trees are missing due to past high grading of large trees, which alt. 2 would repeat by removing large Grand fir. It is only small, young tree density that is notable or excessive throughout the sale area. See our many photos showing these conditions, as well as our survey sheet descriptions. "Fuel loading" is higher due to small young tree density (up to 9-10"dbh in most cases), not due to mature trees. This is an important distinction and reality that should have been disclosed.

Logging mature and large trees would increase drying out of the forest due to loss of shading and down wood, in addition to warmer temperatures from climate change.

Large old live trees have already been removed by logging and increased stress from small trees' competition for water and nutrients, leaving mostly large and old snags and logs, not live large trees. See our photos and survey sheets, which are part of our comments, showing evidence of existing conditions.

The proximity of four timber sales surrounding the North Fork Crooked River timber sale area that were either implemented recently or are presently being implemented by the Forest Service substantiates our argument that there is too much commercial logging on a landscape scale, with resulting loss of mature forest cover and future large tree growth, greatly degrading wildlife habitat and reducing forest moisture retention and tree carbon sequestration and storage. (See p. 3, last par. with 2019, 2016, 2014, and 2012 signed decisions.) This landscape scale loss of carbon sequestration and storage is a loss over potentially hundreds or thousands of trees, reducing large tree carbon sequestration over hundreds of years and loss of further decades to a century of carbon storage in the later large tree snags and logs. By comparison, most timber products store carbon for only a decade or less. Likewise, wildfires store more carbon in the ecosystem than logging, with retention of live trees, snags, logs, and ash returned to soils. Yet the EA does not disclose the science revealing these outcomes.

Planning for commercial logging ignores the existing condition in the sale area and in the surrounding area recently logged in four timber sales.

There's hardly any mature trees left in the RHCAs, let alone large trees. We support riparian hardwood recovery through non-commercial thinning, prescribed burning, planting native riparian hardwoods from

local sources, and excluding cattle from all the RHCAs. We support felling trees less than 15" dbh for floodplain and stream roughness. We support protection of springs, seeps, and wetlands, and non-commercial thinning and prescribed burning to open up dense stands.

Prescribed burning should not be used in mixed conifer forest that has evidence of historic mixed conifer (see our survey sheets regarding this section on the front of the survey sheets) where the forest is suitable Pileated woodpecker and/or marten habitat, or where there are signs of Pileated woodpecker foraging and/or suitable burrows for marten. See our survey sheets in the wildlife section and our photos of wildlife sign as part of our comments, which should help identify specific commercial sale units that have specific species' wildlife sign or a lot of signs of more intensive wildlife use.

We are opposed to re-opening closed roads that are not being maintained for seasonal use and construction of any so-called "temporary" roads. We support road closures and especially road decommissioning to increase wildlife security areas in size and stop ongoing sedimentation of streams from closed roads.

Climate change adaptation measures cited are mostly acceptable to us, with the exceptions of commercial-size logging, which is unwarranted in this sale area (as well as across National Forests that have been subject to about a century of intensive and extensive logging) and re-opening of closed roads or constructing "temporary" roads, which are harmful to ecological resilience and generally unnecessary.

We support most of the stated specific objectives of the project on p. 4, with the following exceptions: Only small tree density (generally only up to 9" dbh) is excessive due to past high grading and landscape scale reduction of mature forest (e.g. with significant numbers of trees >15" dbh), so only small tree density (usually only up to 9-10"dbh or 12"dbh at the most) should be reduced. We support maintaining and <u>increasing</u> large old trees by not logging any large trees and not logging mature trees >/= 15"dbh in order to reduce the great deficit of mature and large trees compared to historic conditions. Don't re-open closed roads or construct "temporary" roads, which is contrary to reducing road density. Wood products such as firewood, posts, and poles could be provided to the public, but commercial-size logging would exacerbate forest destruction.

Management Direction and Guidance:

Winter range should only be non-commercially thinned up to only 9" dbh if needed and/or prescribed burned, as most winter range has little existing thermal cover, which elk and deer will need to survive more severe winter storms under extreme climate change. Hiding cover patches of small trees should be retained for protection against predators. This applies to both "Winter Range" and "General Forest Winter Range."

The North Fork Crooked River Wild and Scenic River Corridor should only be non-commercially thinned up to only 9" dbh if needed, and/or prescribed burned only if needed, to "maintain and enhance natural appearing landscape" and to protect the Wild and Scenic River outstanding value designations.

Old Growth Management Areas should not be commercially logged, as most of the sale area (the vast majority of it) lacks historic levels of fully mature and old forest structure compared to historic conditions. Further, the Ochoco Forest Plan prohibits commercial logging in OGMAs, since they were designated to protect big enough blocks of habitat for Pileated woodpecker, marten, and other old growth-adapted species that require adequate canopy closure and old growth structure. We appreciate the Forest Service staff recognizing this. Any management in Old Growth Management Areas should be confined to non-commercial thinning by hand up to only 9" dbh.

There should be no commercial logging in RHCAs as commercial logging is inconsistent with adhering to RHCA management emphasis and to meeting Riparian Management Objectives. RHCAs should only be managed with non-commercial thinning up to only 9" dbh by hand if needed for establishing riparian hardwoods. Fires should not be ignited in RHCAs but could back into RHCAs, as proposed for this project.

Eastside Screens:

We are strongly opposed to the revision of the Eastside Screens in January 2021 (during the pandemic and just before Trump left office) to replace the legally enforceable 21"dbh limit for logging live large trees with a toothless voluntary guideline that has already stimulated plans to log off large trees on a landscape scale with no apparent limit to the numbers removed. Large tree logging is being planned under broad, comprehensive rationales for multiple tree species in multiple landscape scale timber sales on multiple Blue Mountains National Forests, including the Malheur, the Umatilla, the Wallowa-Whitman, and the Freemont-Winema. With so many timber sales with proposed large tree logging, the cumulative removal of existing and future large tree structure would be overwhelming and devastating.

David Mildrexler's study has shown that only about 3% of these Forests have large trees—a huge deficit compared to historic conditions. Large tree structure is critical to protect from logging removal due to its importance to maintaining suitable habitat for many wildlife species, including Management Indicator species, including Pileated woodpecker, Williamson's sapsucker, Northern flicker, White-headed woodpecker and Vulnerable-ranked American marten, as well as Northern goshawk, Sensitive-listed Lewis' woodpecker, Great Gray owl, and Sensitive-listed Pacific fisher, who den in large cavities in big old growth firs. Aquatic species that require large wood for pool creation that provides refugia and cool water include Threatened-listed Bull trout, Threatened-listed Mid-Columbia Steelhead trout, Threatened-listed Chinook salmon, and Sensitive Redband trout.

Further, it is more important than ever to retain and increase large tree structure (which is also embedded as a goal in the Blue Mountains Forest Plans) for long-term carbon sequestration and storage to reduce and slow extreme climate change.

The critical need to preserve and increase large trees and mature forest cover is also an imperative in the context of the Sixth Mass Extinction, as well as the now foreseeable looming loss of the viability of the planet for humans and many other species. Scientists are now predicting the extinction of 10-50% of all animal species by the end of the century, which would likely result in an unlivable planet for humans.

We are actively litigating against the 2021 revision of the Eastside Screens, along with other environmental protection organizations. The return to logging large (and inevitably old) trees already portends landscape scale significant cumulative negative impacts to wildlife species dependent on large tree structure and to critical ecological processes and functions.

Commercial logging in RHCAs poses an existential threat to protecting populations and habitat of resident native fish and other aquatic species, which is the explicit goal and direction of INFISH. Commercial logging removes mature and large structure for pool formation, shading, and cooler stream water and increases excess fine sediment, which can affect fish breathing and underwater visibility for fish to detect predators or prey.

The EA should have disclosed and analyzed in depth the above negative effects in our comments from commercial logging of large trees and commercial logging in Riparian Habitat Conservation Areas.

What we saw in our field surveying public involvement:

More Forest Service staff members should go out and look at all the proposed sale units on the ground more comprehensively. The only significant density is small non-commercial size trees, not large trees, and not fully mature trees. The same is true in the RHCAs. This is obvious on the ground.

There are very few sale units that even have large tree size classes! Most of our sample photos submitted with our comments are associated with survey sheets for sale units with more old growth structure that represent some of the best wildlife habitat available. We did not submit photos for the majority of the sale units that have even more dismal conditions, with dense small tree thickets and hardly any fully mature (>/= 15" dbh) or large trees. For many of the sale units without submitted photos, there were hardly any photos or they showed hardly anything other than dense small trees or barren areas. This was especially the case for many of the sale units east of the Crooked River. See our survey sheets for those sale units. Some of the survey sheets also don't have detailed descriptions of the conditions because there wasn't much to see regarding wildlife sign or mature or old growth forest structure.

Planning Issues & Key Issues:

Large tree logging:

Large trees across species are more resistant to fire and support many wildlife species dependent on large tree structure. Large trees (regardless of age) should be fully protected from logging, as well as most mature tree cover, which forms the basis for future recruitment of large live trees and large snags and logs to increase the presence of large tree structure on a landscape scale. It is critical not only to maintain existing large and mature trees, but to increase the size of existing trees by letting them grow larger and not removing them. Large trees sequester and store the most carbon. There is already a deficit compared to historic conditions of both large trees and fully mature forest cover. Why does the Forest Service not care about that deviation from historic conditions (greatly reduced abundance of large and mature trees) before European colonization, but only about Historic Range of Variability concepts that are used to justify logging? This is a long-standing bias of the Forest Service in serving the timber industry rather than the long-term public interest.

Now the viability of the planet is at stake, with the need to protect as much green mature forest cover and large tree development and structure as possible, in order to maximize forest carbon sequestration and storage to reduce global warming effects and help stop the Sixth Mass Extinction of wildlife species. The Forest Service needs to stop and reverse its mission of logging to the point of no return.

Re: the North Fork Crooked River timber sale in particular, go see for yourself how few large Grand firs are left throughout the sale units! There's hardly any Grand fir in the 21" to 30" dbh range overall, throughout the sale area. Some of the photos we submitted show some of the best mixed conifer mature and old growth stands that we surveyed. Large Grand fir are not dense at all.

Most of the old growth in the sale area is already single stratum, unless you erroneously count the non-commercial size understory as part of the mature and old growth canopy. This may account for the claim of their being too much multi-strata LOS, since Ochoco Forest Service staff suddenly changed the medium size mature tree class (about 15-21" dbh) to the "small" tree class, including all trees 9" to 21" dbh as "small" trees—just for this particular sale area, as far as I know. I have been surveying proposed timber sales in the Blue Mountains since 1991 and have not seen tree size classification without a category of mature or medium-sized trees—generally in the 15" to 21" dbh range.

The Forest Service has wanted to eradicate Grand fir since at least 1910, based on historic records, when the agency was more honest about wanting to get rid of Grand fir because it is not a preferred

timber industry tree species. Yet Grand fir is an important tree species to retain for wildlife species and for its survival tactics to retain water within the trunk and roots to survive major insect epidemics and retain water within the base of the trunk in cavities that offer available and accessible water for small mammals, reptiles, and amphibians during hot summers. Pileated woodpeckers and Black bears preferentially forage on Grand fir logs and snags. Great Gray owls nest on broken-top Grand fir snags. Grand fir is documented in a scientific study to be able to survive a spruce budworm epidemic after becoming completely defoliated after just one wet winter. I observed this phenomenon in the Flat Iron sale area on the Heppner District of the Umatilla National Forest in the early 1990's. Further, Grand fir are needed by species that need abundant snags and logs. Grand fir supply snags and logs on a more frequent basis than some of the other tree species. Large Grand fir also develop cavities at the base that are used for protective shelter by American marten and other animals. I have photographed cavities under Grand fir that were big enough to sit or lie within them, meaning that they could accommodate bobcats, foxes, or even cougars. Old growth big Grand fir also provide sufficiently big cavities further up the tree to provide denning spaces for Pacific fisher. It would be good for the Forest Service to respect the capabilities of Grand fir before systematically eradicating it completely.

Tree species diversity is important to preserve wildlife diversity and to retain resilience to defoliating insect epidemics that have insect species adapted to a particular tree species. Tree species diversity is also crucial for other plant diversity. Different tree species are adapted to different moisture regimes, elevations, topographical aspects, and soil types. This ensures more resilience to rapidly changing climate conditions than converting diverse forest to homogenous, same tree species plantations.

Large tree logging—and most or all mature tree logging—would not achieve the goal or reducing any excess density and improving tree growth since the density is only small trees. Likewise, due to the scarcity of large trees and fully mature forest stands, large tree logging and mature tree logging would not enhance "forest health" and improving tree species composition. Very few sale units have much tree species diversity. Most sale units are Ponderosa pine, and any significant mixed conifer component has evidence of being historic mixed conifer, as far as we saw. "Economic opportunity" has to be shelved as an objective or goal when the forest is already so extremely degraded by past logging of large and mature trees.

It's ridiculous to plan to log any large trees in this sale. Look at all the numerous old growth stumps in our photos: old growth Ponderosa pine, Douglas fir, Grand fir, and possible Western larch stumps. It would be highly damaging to these stands to remove trees 15-21" dbh, let alone large trees. This is one of the most thoroughly logging degraded proposed timber sale areas I've seen in 32 years of field surveying.

Re: Discrepancy between Scoping and the EA re: logging large trees:

Based on what I remember and could find in documents regarding the North Fork Crooked River project, I wrote comments on pre-scoping, which did not disclose any plans to log large trees. In fact the District Ranger even raised the possibility of not doing any commercial logging in this area. I don't remember writing Scoping comments on the NFCR project and couldn't find any scoping documents or any scoping comments I wrote in my files or on my computer. Did the Forest Service skip official scoping and go straight to releasing an Environmental Assessment? Unless I'm missing something, this timber sale was not scoped for logging large trees. This is an apparent violation of NEPA not to disclose such a significant and controversial planned management impact in scoping and then include it in the EA. Legal standing arises from Scoping comments alone, without comments on an EA or EIS. Most people submitting stand alone scoping comments on this sale had no way to anticipate planned large tree logging being proposed in the EA. So people who wrote only scoping comments may have thought there was no

need to submit EA comments on this issue. In this situation, those who submit an objection on the NFCR timber sale "project" might not be allowed to contest the large tree logging if they didn't write comments expressing concerns opposing large tree logging. That would be unfair to those who only read and commented on the pre-scoping or scoping information. If there was a scoping letter sent to interested people after the pre-scoping information, please send a copy of it to me by mail, including the date. If there was no scoping comment opportunity after "pre-scoping", this project should require a new scoping period and distribution of scoping information that discloses the planned large tree logging under alternative 2.

Logging in Riparian Habitat Conservation Areas and Potential Impacts to Streams:

We can't support any large tree logging and too much commercial logging and thus oppose alternative 2. Look at the RHCAs on the ground. See our photos and survey sheets regarding riparian areas. There are not many mature trees within RHCAs due to apparent past logging within RHCAs or increased growth of young conifers (seedlings and saplings) due to the drying out of the RHCAs from past logging and/or livestock grazing. Drop the 259 acres of proposed commercial logging in RHCAs in alt. 2. The only "hazardous fuels" (small biomass) in RHCAs seem to be non-commercial size trees. We support only non-commercial thinning in RHCAs and potential prescribed fire backing into riparian areas, as with alternative 3.

There should be no grapple piling in RHCAs. Lop and scatter or use pile burning or prescribed under-burning without ignition in RHCAs.

Wild and Scenic River Corridor Management Proposed:

We support no commercial logging in the Wild and Scenic River corridors and only non-commercial thinning. Look at our survey sheets for that area. There are dense spindly thickets, dry conditions, and not many mature or large trees left from past logging, unless part of this overlaps the Undeveloped Area, where we strongly oppose commercial logging. More commercial logging would not "maintain or enhance scenic, recreation, or water quality values over the long term" (EA p. 9) and would not meet Management Area requirements for the Wild and Scenic River corridor.

Description of Activities: (starting on EA p. 11)

Silvicultural Treatments [i.e. logging]:

Please don't use grapple piling, as there is already widespread evidence of detrimental soil conditions from past logging and livestock grazing, including unregenerated skid trails, areas of bare ground, and simplified plant communities. Ground disturbance and severe soil burning would greatly increase the introduction and dispersal of invasive plants, which would increase fire risk and reduce plant biodiversity.

The intent of thinning is stated to be "to improve stand resilience and maintain and/or enhance late and old structure (LOS) components in [managed] stands." (EA p. 11) Yet this intent cannot be met if large trees are logged, as under alt. 2. It is completely contradictory to have an intent to maintain and/or enhance late and old structure in stands, when some of the large trees would be logged and mature trees up to 21" dbh would be logged, perpetuating a future deficit in large tree structure. This is quite obvious on the ground, where there is a great deficit in large and old structure across the entire sale area on a landscape scale, due to past heavy logging removal of large and old trees.

The authors of Van Pelt 2008 clarify that the visual characteristics for determining old growth status is not as likely to be accurate for fir species. So inevitably old growth firs would probably be logged.

Further, the EA is claiming to intend to retain large trees while planning to remove large Grand fir under alternative 2. Thus under alt. 2, it would not be true that "retention of old and large trees is emphasized in all treatments." (EA p. 11, 1st par.) This is glaring hypocrisy. Also, statistically Grand fir were found to be at least 150 years old (old growth) at 22" dbh, based on Forest Service tree coring of Grand firs in the Ursus timber sale area on the Bend-Fort Rock Ranger District of the Deschutes National Forest.

The Forest Service use of Historic Range of Variability (HRV) to justify heavy logging is very questionable. Tree species diversity retention is important for wildlife and to reduce the spread of insect epidemics. Tree species diversity is also important for maintaining native plant diversity and more moisture from shading in natural mixed conifer. Many wildlife species need higher canopy closure (e.g. Pileated woodpecker and Northern goshawk) or greater density (e.g. American marten, Rocky Mountain elk, and Mule deer.)

We oppose management for conversion to, or maintenance of relatively sterile, homogenous pine plantations.

Re: the last par. of EA p. 11: There's very little Lodgepole pine, Douglas fir, and Grand fir left in these stands already. It is very cynical and disingenuous to give precedence to achieving artificial, fairly arbitrary density ranges by removing the few large trees left and sometimes, removing last old growth trees left.

Most tree species naturally grow in groups, including Ponderosa pine. Trees growing in groups should not be spaced widely apart, as this separates them from mycorrhizal networks underground that transfer carbon and nutrients to the trees in the stand and can send chemical signals from trees being affected by insects to other trees in the stand, like a warning to raise chemical defenses. (This is based on Suzanne Simard's research since the 1990's, summarized and cited in her book Finding the Mother Tree, Discovering the Wisdom of the Forest.)

Re: p. 12 of the EA:

The Forest Service is failing to disclose, consider, and use the more recent science studies showing there is still a huge deficit in large and old tree structure compared to historic conditions. HRV based on a legitimate pre-European colonization local area base line would not indicate a need to require logging large or old trees at all. The critical imperative is to protect all large trees from logging since they sequester and store the most carbon for up to centuries. Global warming threatens to end the viability of the planet for humans and increasing the risk of losing 10-50% of all species by the end of the century.

Wild fires, insect outbreaks, and droughts under extreme climate change will inevitably thin the forests regardless of any fuel reduction. More homogenous plantations are being perpetuated under the guise of fire risk reduction, yet the logging out of mature and large trees would reduce stand resistance to fire, since mature and large trees survive fire better than small young trees. The viability of the planet should take precedence over Powell (1999). Powell (1999) is outdated and overused. Quit incrementally destroying the forest by over-logging it.

Based on our field surveying, there are hardly any large or mature trees in most (or almost all) of the RHCAs, as well as in meadows, upland stands, etc. It's non-commercial size small trees that are relevant to encroachment interfering with riparian hardwood growth, along with over-grazing by livestock and wild fire suppression, which should be addressed. The Forest Service needs to start using smaller dbh limits than 21" dbh for logging—12-14" dbh at most. In this sale area, the vast majority of conifer density is only up to 9" dbh. There's no "need" for commercial mature tree logging in this area.

Conifers greater than 21" dbh are not usually "young", but old growth. What happened to recognition of the next size class of 15-21" dbh as "medium-sized" or mature? This is the size class next in line to grow into large, old trees. This is the size class of trees that would restore missing large trees if they are allowed to grow bigger. They are mature, not "young". There is no reasonable "need" to cut down conifers >21" dbh for in-stream wood—especially when large trees are at such a huge deficit in the sale area. There are small streams with hardly any large trees.

All existing large trees need to be retained, not just old trees. The Forest Service needs to keep in mind that there were more trees per acre historically in young stands, and fewer trees in old growth stands. Thus it doesn't make sense to bring young stands down to the wide open old growth Ponderosa pine stands. There is useful mortality along the way from young stands to old growth, forming snags and logs and gradually thinning the stand over time. Logging young stands into widely spaced trees disconnects them and does not allow for enough snag and log creation for wildlife.

Grand fir in marginal conditions will be thinned out by climate change droughts. Snags and logs need to be retained for wildlife habitat and carbon storage.

Re: EA pp. 12-13:

Ongoing tree mortality:

Natural disturbances increased by climate change-increased droughts, heat waves, insect outbreaks, and wild fires will cumulatively thin the forest to lower densities and fire mosaics. It's more important than ever to retain as much green forest as possible, not log it. Climate change will create far more natural and beneficial patterns than logging for private profits on public/indigenous people's lands. The Forest Service needs to change its mission from resource extraction at any ecological cost to working <u>with</u> Nature, including climate change, not trying to anticipate which trees will be lost and hastening their loss by logging. Non-commercial thinning and prescribed burning can be useful to remedy effects of overstory logging, high grading, and wild fire suppression. Commercial logging would only make the existing degradation worse.

Re: hazard trees, there are not many large trees, so the area from the road with felled trees should reflect the height of hazard trees, not be 150 feet out from the road, which is excessive.

All large or old snags should not be felled inside sale units, but buffered for worker safety.

Vegetation Management Specific to Alternative 2:

The commercial logging planned would <u>not</u> maintain "a diverse range of forested conditions" because thinning is designed to discriminate against mixed conifer where it naturally exists and would remove yet more mature and large trees when there is a huge deficit of both in this area. Commercial logging would homogenize the stand and limit tree species and tree age and size diversity.

There should be no commercial-size logging in <u>any</u> of the few remaining LOS stands, including multi-strata LOS stands, where density is mostly or totally from NCT-size trees. Most of the mature and large trees are already widely spaced from past commercial thinning. Targeting mixed conifer for logging reduces diversity, as there is little mixed conifer in the sale area.

Planning to commercially log in RHCAs (especially in Category 1 and 2 RHCAs) is planning to destroy fish habitat, based on the science and feedback from Forest Service fish biologists.

The language used in the EA is misleading, as "recruitment" of large trees does not mean protecting them from logging removal, but cutting down more mature trees that would otherwise develop into old growth.

Logging in RHCAs violates INFISH and could prevent streams from attaining Riparian Management Objectives.

Three comments from EA p. 14 handwritten comments, with the rest from that page not typed:

Vegetation Management Specific to Alternative 3:

Only Alternative 3 could be the starting point of any negotiations on this sale, as we are strongly opposed to commercial logging of large trees, RHCAs, Wild and Scenic River corridors, Northern goshawk PFAs, and large snags unless they are legitimate hazard trees, and removal of large wood.

With all these management impacts from past misguided management from the existing degraded conditions, the EA fails to disclose and analyze these cumulative effects What is the past history of logging in the North Fork Crooked River sale area? Why is this not disclosed in the EA? There are obvious cumulative negative impacts from logging: high-grading removal of large and old tree structure, loss of most mature forest cover—apparently due to past clearcutting and planting of even age Ponderosa pine plantations, past commercial logging leaving mature trees so widely spaced as to be virtually sterile, and loss of plant diversity and soil loss of productivity and loss of moisture retention from both logging and over-grazing by livestock.

Re: p. 15, two comments typed, not all.

Has the Ochoco staff ever consulted with indigenous people native to the Ochoco National Forest area regarding indigenous fire methods and timing? If not, why not? The Forest Service could learn a lot about where indigenous burning took place, when, with what methods, and for what goals. The lands in eastern and central Oregon were subject to indigenous people's burning practices, so the land was shaped by this burning for a long time. The Forest Service has a lot to learn from indigenous Nations regarding better management of forests and other lands.

Travel Management:

The Forest Service should not continue to "store" closed roads for future timber sales…in line with changing course from continuing to log already over-logged forest and never allow it to fully recover and re-wild itself. The current Forest Service logging is completely unsustainable in scale, pace, and intensity. This is not restoration, but forest liquidation.

Comments on EA p. 16:

It is reasonable to have seasonal closures on roads that are still maintained (e.g. for more security habitat during hunting seasons.) However, the Forest Service has habitually promised environmental protection groups to close roads and to decommission them, while never fully decommissioning the roads (e.g. with re-contouring) and re-opening the roads again for the next timber sale, making these de facto system roads.

The Ochoco staff have a terrible history of past failure to effectively close roads. Rocks, berms, signs, and wooden post and pole gates have generally not worked. The road signage and lack of signage has also been massively confusing and counter-intuitive to us and many other Forest visitors. A lot of the theoretically closed roads look open and continually used, while a lot of the open roads are in much worse

shape than the “closed” roads, and are clearly not maintained. What have the Ochoco staff done to correct this, including future plans for this sale area? We had to avoid some areas of main open roads while field surveying this sale—at an unmaintained cattle guard hard to cross and a main road along Fox Creek with a deep hole that could bottom-out my 4 wheel drive truck. We had to figure out alternative routes.

We are strongly opposed to any construction of “temporary” roads, as they are usually never fully decommissioned and are usually re-used again as de facto open roads and since they fragment wildlife security habitat, encourage ATV access, enable illegal firewood cutting, and introduce and disperse exotic invasive plants, and increase access for livestock and fur trapping. We are also opposed to re-opening of closed roads that are not maintained for seasonal use. The Forest Service has built an absurdly extensive road system in National Forests, including the Ochoco, including unnecessary, redundant, and ecologically damaging roads.

Drop all miles of road reconstruction and opening of closed roads that are not being maintained now, and drop all “temporary” road construction on existing and new disturbance.

Chapter 3—Environmental Impacts of the Proposed Action and Alternatives:

Actually, there is scientific controversy over the effectiveness of current “Best Management Practices”, which do not appear to have minimized or eliminated negative impacts in riparian areas re: commercial logging in RHCAs. So no, we don’t agree that we should blindly trust the “Best Management Practices” to fully protect riparian functions and processed, water quality, and fish habitat. The Forest Service should have disclosed and discussed objectively the concerns over Best Management Practices not being sufficient to protect water quality, fish habitat, and riparian ecological functions and processes. The science supporting RHCA buffers, Riparian Management Objectives, and other elements of INFISH are based on good science that has not been disputed.

Likewise, “Resource Protection Measures” have not fully protected riparian ecosystems or forest integrity, as we have witnessed cumulative degradation with each timber sale, regardless of design criteria and BMPs, with few exceptions. This is especially the case since the so-called “accelerated landscape scale restoration” Forest Service trend, which actually has increased logging intensity to virtual clearcuts on a landscape scale, under an unsustainably short timber sale rotation of 30 years or less.

The focus is not “on cause and consequences” until specific root causes of current degraded conditions are identified and analyzed in depth for cumulative effects analysis, and unless the findings are used for real adaptive management.

The Ochoco Forest Plan is very outdated re: perpetual active management of forest stands, regardless of the ecological degradation consequences.

What parts of the I.D. team reports are not included in the analysis summaries?

Cumulative Effects Considerations:

This is inadequate cumulative effects analysis, based on NEPA requirements. The EA uses this as weak subterfuge to avoid taking a hard look at the root causes of existing degraded conditions, which could lead the Forest Service to use adaptive management to address root causes of problems and actually restore ecosystem functions and structure, based on a learning curve shift away from past management mistakes.

Consideration of current best available science over its full range, and disclosure and analysis of science now conflicting with outdated science and assumptions are also lacking. This perpetuates ecologically

destructive management practices rather than turning to ecologically sound regenerative restoration. The Forest Service's current management paradigm has failed to make the forest more resilient to natural disturbances and whole, as an intact, functioning forest ecosystem.

We reject the claimed validity of the Forest Service's failure to analyze in depth the specific causes of cumulative effects in order to learn from past management mistakes. This is the EA's portrayal of the Forest Service's sweeping detailed cumulative effects analysis under the rug so as to hide the repeated management disasters that caused the existing ecological degradation from past timber sales:

"In order to understand the contribution of past actions to the cumulative effects of the proposed action and alternatives, this analysis relies on current environmental conditions as a proxy for the impacts of past actions. This is because existing conditions reflect the aggregate impact of all prior human actions and natural events that have affected the environment and might contribute to cumulative effects. By looking at current conditions, the Forest is sure to capture all the residual effects of past human actions and natural events, regardless of which particular action or event contributed to those effects." (EA p. 17, first par. under "Cumulative Effects Considerations")

In fact, this is contrary to NEPA's intent to take a hard look at environmental impacts and results in the Forest Service not using adaptive management from specific insights into management causes and effects and consideration of how to avoid repeating past mistakes. In depth cumulative effects analysis is crucial to protecting the forest ecosystem from cumulative negative impacts further compounding existing damage through repeating failed management approaches.

Not all of the land in the North Fork Crooked River sale area is really suitable now for livestock grazing, since many areas are badly over-grazed and impaired from logging. This is part of cumulative effects analysis, not outside the scope of such analysis. Yet there is little cross-communication within the Forest Service to bridge the divide between livestock allotment management and timber sale management, even though those are both degrading the forest and grassland ecosystem in the same planning area.

Forested Vegetation:

Re: p. 18, only the second comment typed:

Re: Failure to Disclose Scientific Methodology:

So many models and simulations are used in the methodology, as opposed to comprehensive field surveying, that without knowing the assumptions fed into the models, this process could be a "garbage in, garbage out" scenario. Surely all these models and simulations and assumptions used can't replicate true existing conditions on the ground, including variations in tree species composition in relation to ecological factors supporting forest type changes within a stand, the tree sizes causing density, wildlife use of the area, riparian conditions, and existing soil damage extent and causes. What were the input assumptions used for eCognition software, LIDAR imagery, Gradient Nearest Neighbor, and the Viable Ecosystem Management Guide? We request that this information be mailed to me. NEPA requires disclosing methodology, which should include the assumptions fed into the models or simulations.

Other sample comments from the handwritten comments: These are not inclusive of all comments on the following pages of handwritten comments but the rest of the handwritten comments should be readable.

Typed comments correct some mistakes in handwritten comments.

Re: p. 21:

Very outdated Forest Plans lead to reliance on very outdated science, allowing the Forest Service to ignore the whole range of current best available science and to persist with repeating management mistakes, then using the degraded forest conditions as an excuse for more logging, based on bad management practices. This is essentially rewarding bad management practices and avoiding adaptive management.

Re: p. 61:

The EA analysis makes it clear that the North Fork Crooked River sale area is already not meeting snag abundance and size requirements based on comparison with historic (or never logged) snag levels and sizes. This results from so many mature and large trees being logged in the past, yet both alternatives would repeat logging of mature trees although they are few and already widely spaced. This would further reduce available large snags and abundant snags per acre to the detriment of wildlife species depending on large snags, large logs, abundant snags, and abundant logs into the future. Such reduction of large snags and abundant snags, as well as future large and abundant down wood, would violate Forest Plan requirements for snags and logs.

Re: p. 62:

The omission of common natural disturbances from the "Forest Vegetation Simulator" makes future projections completely unreliable.

Re: p. 64:

It's misleading to use the excuse that "the loss of habitat would be insignificant at the scale of the Forest" without disclosing and considering the effects of all the other timber sales' effects on snags and logs at the scale of the Forest, as the effects are cumulative to the viability of wildlife species, including Primary Cavity Excavators.

It's not sufficient just to state that the NFCR sale "is consistent with the Forest Plan, and thus continued viability of primary cavity excavators is expected on the Ochoco National Forest." There is no analysis that really supports these conclusions: 1) that the NFCR sale is consistent with the Forest Plan, and 2) that consistency with the Forest Plan really ensures continued viability of Primary Cavity Excavators. That has not been the case, since many wildlife species are in decline after similar timber sales.

Re: p. 83:

If the information as to the population of Northern goshawks on the Ochoco National Forest, and within the District and the project area was disclosed and evaluated, this would greatly inform decisions as to how much protection goshawks need. The EA should also be disclosing relevant science regarding habitat requirements and any new science that explores better protection methods for goshawks.

Re: p. 111:

The existing condition of such extensive invasive plant populations is shocking. Houndstongue, Medusahead, and Ventenata grass are the largest infestations, and all three species are difficult to control. It's imperative not to continue extensive ground-disturbing management practices—including commercial logging and road re-opening and reconstruction.

Re: p. 119:

We are very concerned by proposed further ground disturbance and adding more detrimental soil impacts on top of the 266 sale units currently exceeding 20% detrimental soil conditions, the Forest Plan limit. Although FSM 2500, R6 Supplement 2500-98-1 exists, it is an unethical loophole that allows for further damage to soils already at the Forest Plan detrimental soil limit. Thus, there is reliance on soil mitigation measures to keep the added soil damage to the 20% limit, yet the soil mitigations used are not completely effective (e.g. sub-soiling or "tillage") and are often never fully implemented or effective.

Re: p. 123:

Caveats by the soil scientist (underlined on EA p. 123 of the handwritten comments) cast doubt on the conclusion that "all ground based mechanical activity units would meet soil quality standards upon completion of project activities…There never seems to be any follow through after timber sale logging to ensure that sale units already with 20% or more detrimental soil impacts would "at a minimum, not exceed the conditions prior to the planned activity and should move toward a net improvement in soil quality."

Re: p. 135:

We are also very concerned by there being 13 miles of 303D-listed streams in the Fox Canyon Creek subwatershed and 6.8 miles of 303D-listed streams in the Upper and Dry Paulina Creek subwatersheds in the NFCR project area. The Forest Service is not allowed to further impair 303D-listed streams for their criterion or criteria for impairment. The Forest Service should not impose more commercial logging damage in RHCAs. (See EA Table 57, pp. 135-136.)

Re: p. 197: Drop all commercial logging planned for undeveloped lands—the 665 acres under alt. 2 and the 465 acres under alt. 3.

Please read the rest of our handwritten comments, that should be quite legible. Thank you for your consideration of our comments. Please keep us informed as to all developments with this project.

For the Wild,

Karen Coulter, Blue Mountains Biodiversity Project