



March 20, 2024

Ms. Shaniko Cowie
Deputy Fire Staff/ Project Lead
Wallowa-Whitman Supervisors Office
1550 Dewey Ave., Suite A
Baker City OR 97814

Submitted electronically at <https://www.fs.usda.gov/project/wallowa-whitman/?project=65581>

RE: West Wall Defensible Fuel Profile Zone (DFPZ) Project

Dear Ms. Cowie,

I am writing on behalf of the Greater Hells Canyon Council (GHCC) regarding the West Wall Defensible Fuel Profile Zone (DFPZ) Project. GHCC is a non-profit conservation organization based in Northeast Oregon with over 2,000 members and supporters. We were founded in 1967 (as Hells Canyon Preservation Council), and our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

We appreciate the opportunity to provide these comments on the project.

The Project Area

The project area lies in Baker County, OR, on the Wallowa-Whitman National Forest, Whitman Ranger District. It is located North and West of Halfway. Access is by National Forest System Roads (NFSR) 77, 7705, 7710, 7741, and 7715. The proposed treatments are within and directly adjacent to the Carson/Pine Valley Wildland Urban Interface area described by the Baker County Community Wildfire Protection Plan.

The Proposed Action

Proposed fuel breaks would consist of a combination of commercial and noncommercial thinning, and road improvements to give firefighting resources a safer place to work, and higher probability of success when engaging with a wildfire. The treatment is planned for approximately 3,000 acres of forested land along roads and private property boundaries.

- Commercial logging (commercial thinning) is proposed for a total of 1,773 acres. Of this total, ground based logging (commercial thinning) is proposed for 1,079 acres.





Cable assisted logging (commercial thinning) is proposed for 694 acres on steeper forest areas.

- Non-commercial thinning (not connected to logging) is proposed for 1,053 acres.
- Total thinning acreage is 2,826 acres.
- Slash piles would be created by hand piling and machine piling.
- Piles would be burned.
- DFPZ's are likely to need maintenance treatments which would be accomplished by underburning, manual or mechanical methods (additional thinning and piling if needed) approximately every 10-15 years
- Roads – roads would be improved to reduce future maintenance costs and to improve public safety by removing trees encroaching onto the road prism.
 - Within 10 feet either side on the road prism all trees would be removed, except for trees greater than 21 inches dbh., and in RHCAs. In general trees greater than 7 inches dbh will be harvested, and trees less than 7 inches dbh would be felled, piled, and burned. This would apply to all roads used for timber harvest. In addition, blind corners would have site distances improved by removing trees as described above. See sight distance guidance in appendix 1.
 - Roads used to access NCT units may have trees less than 8 inches dbh. felled, piled, and burned within 10 feet of the road prism to aid access if not used for harvest. Only hand piling would be used within RHCAs.
 - An estimate of 34 segments of new temporary roads will be created for a total of 5.8 miles. An additional .63 miles of temporary roads will be created on existing templates. Temporary roads would be closed and restored after harvest activities have been completed.

Categorical Exclusion

This project would be analyzed as a Categorical Exclusion under Section 605 of the Healthy Forest Restoration Act.





GHCC COMMENTS ON THE PROPOSED ACTION

Introduction

In general, we support vegetation management projects in forests that would benefit ecologically from management activities; that address impacts of cross-country travel and reduce overall road density by returning expensive and deteriorating forest roads to the wild; and include components to improve watershed conditions and forest resiliency. Therefore, when reviewing projects, GHCC carefully evaluates the proposed action against the following criteria:

- Focus on previously logged sites. Forests that have not experienced the same logging and road-building regime as other federal lands are relatively rare and have high conservation value, especially in areas like this that have a past history of intensive logging. These previously unlogged forests are often mature or old growth forests and are often important for carbon sequestration. Soils in these forests have not been impacted by machinery and their underground ecosystems would be expected to be intact and rich in ways that are likely underappreciated and incompletely understood. Mycorrhizal networks are likely intact in these forest soils. Restoration is generally unnecessary in these forests or else can be achieved using fire alone.
- A compelling ecological need that is clearly identifiable and warrants the proposed action. Returning stands to the Historical Range of Variability (HRV) alone should not be used as a justification for landscape-scale commercial thinning.
- Protect all trees with old growth characteristics regardless of their diameter or species. Old growth characteristics include thick bark, colored bark, asymmetrical growth, large branches, and dead tops. These old trees will generally be some of the most fire resilient trees on the landscape.
- Protect all large trees. All trees 21 inches DBH and larger of all species should be retained. These large trees will generally be some of the most fire resilient trees on the landscape. Large trees are exceptionally important for carbon sequestration.
- Fuel reduction and vegetation projects affect wildlife, non-native plants and animals, soils, insects, diseases, and more. A holistic approach to landscape management helps enhance positive effects and minimize negative consequences.
- Utilize existing roads for removing and hauling wood products. Eliminate unneeded roads. No construction of new temporary roads.





Strategic Treatments for Fuel Reduction

The overall stated purpose and need of this project is to establish and maintain fuel breaks to reduce the risk of uncharacteristic wildfire on both Federal land and within the community of Carson, and the periphery of Pine Valley. Goals are identified to develop safety corridors and to create, restore, and maintain a fire-resistant landscape to minimize risk and damage.

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

Strategic fuel reduction can generally best be achieved using hand crews to remove the smallest trees while protecting the larger and more fire-resistant trees.

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

We appreciate that this project includes some limited vegetation treatments on specific and strategic locations on the landscape to assist fire managers in the event of a wildfire. We also appreciate that the project proposal includes non-commercial hand thinning of small trees. We appreciate that the project is located within and adjacent to the Carson Valley / Pine Valley WUI and adjacent to the National Forest boundary with private lands. Thank you. At the same time, we have significant concerns with aspects of the proposed management activities. We appreciate your careful consideration of our concerns and our recommendations as the project is developed.

Fuel Reduction and Values at Risk

Fuel reduction treatments are most effective for protecting values at risk when they are implemented adjacent to those values. For example, according to the National Fire Protection Association, “Experiments, models and post-fire studies have shown homes ignite due to the condition of the home and everything around it, up to 200’ from the foundation. This is called





the Home Ignition Zone (HIZ).”

<https://www.nfpa.org/Public-Education/By-topic/Wildfire/Preparing-homes-for-wildfire>

Creating Fire-Adapted Communities as Part of the Cohesive Wildfire Strategy

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

The Firewise USA® recognition program is administered by the National Fire Protection Association (NFPA) and provides a collaborative framework to help neighbors in a geographic area get organized, find direction, and take action to increase the ignition resistance of their homes and community and to reduce wildfire risks at the local level.

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

Wildlife and Fish Habitat

We notice that the project description is silent about fish and wildlife habitat and habitat connectivity, despite the fact that this project appears to have proposed units that overlap with the Oregon Department of Fish and Wildlife’s Priority Wildlife Connectivity dataset. Specifically, we believe there may be both commercial and noncommercial units on acres identified by ODFW as critical for habitat connectivity, called “connectors.” Connectors represent the best available habitat for facilitating movement between regions, and may pass through high-quality habitat in intact, relatively undisturbed parts of the landscape, as well as the best remaining marginal habitat in developed or degraded areas. These connectors facilitate movement between the Eagle Cap Wilderness and important lower elevation habitats.

A very similar concept was previously identified in this part of the Wallowa-Whitman National Forest (the Pine Ranger District). This included the West Wall DFPZ project area. The “Consensus Project” identified wildlife habitat “cores” and “connectivity corridors” where management would prioritize protecting and managing these important habitats. The Consensus Project was a truly collaborative effort with representation of a wide range of Baker County citizens ranging from environmental conservationists, the timber industry, and interested members of the community. The Forest Service actively participated in the process.





It's remarkable that the Consensus Project group developed locally well before the other origin of forest collaborative groups existing now.

The Consensus Project group created the "MS 20-21 Plan" describing wildlife habitat cores and connectivity corridors, as well as other areas to be more intensively managed across this part of the Wallowa-Whitman National Forest. The ODFW Priority Wildlife Connectivity dataset is a modern, agency-developed source of information that builds upon the concepts of habitat connectivity previously created by the Consensus Project. We encourage the Forest Service to honor the considerable efforts of the Consensus Group as the West Wall DFPZ project is developed by fully protecting wildlife habitat and connectivity.

We strongly recommend that a thorough analysis of potential impacts to fish and wildlife and their habitats be included in this project, and that units overlapping with ODFW's connectivity dataset be modified to maintain habitat integrity. Fuel reduction treatments can potentially negatively impact habitat and connectivity. Please ensure that potential impacts are thoroughly analyzed by wildlife professionals and shared with the public.

Use of the amended Eastside Screens & cutting large trees

As you are likely aware, Magistrate Judge Hallman of the District of Oregon recently found that the Forest Service's 2021 Amendment to the Eastside Screens violated NFMA, NEPA and the ESA, and recommended that the amendment be vacated and an entirely new EIS prepared. As a result, the agency should clearly state that the project does not include cutting trees over 21" DBH. We appreciate that trees greater than 21 inches dbh are described to be protected during roadside fuels treatments described on page 3. Please clarify that no trees over 21" dbh will be cut in other aspects of the project.

Roads

An estimate of 34 segments of new temporary roads are proposed for a total of 5.8 miles. An additional .63 miles of temporary miles of temporary roads are proposed to be created on existing templates.. This is a substantial footprint! We advocate eliminating unneeded roads, utilizing existing roads, and avoiding the use of temporary roads altogether. We encourage the Forest Service to consider an approach to meet the project's objectives without constructing any temporary roads, especially if they would be built to access previously unlogged forests, forests of moist plant associations, and forests with steep slopes. Temporary roads are not temporary in terms of their impacts to the soils and forests, even after closure and restoration. Temporary roads are often breached by motorized vehicles even after attempts to close and restore them. Please consider treating areas by hand thinning rather than constructing temporary roads. Please consider the potential wildlife habitat





benefits that may be realized by avoiding logging in forests that could only be accessed by temporary roads.

Logging on Steep Slopes

“Cable Assisted” logging is proposed for 694 acres. We recommend these acres be dropped or converted to hand thinning. We do not see that logging these steep slopes would advance the purpose and need of the project. We are concerned about impacts to soils, wildlife habitat, and habitat connectivity.

We do not support the use of tethered logging for this project. Tethered logging would use ground-based logging equipment on steep slopes. Steeper slopes are more vulnerable to soil compaction, rutting, and soil displacement. Steeper slopes are at a higher risk of water runoff and soil erosion due to ground disturbance from logging equipment.

Cable/ skyline logging is permitted for logging on steeper slopes by the Wallowa-Whitman National Forest Land and Resource Management Plan. Use of ground-based logging systems through tethered logging is not consistent with the Forest Plan and would require a Forest Plan Amendment. This would be inconsistent with the use of the Categorical Exclusion for the project.

Logging in Moist Forests

Logging (commercial thinning) moist forests to increase fire-resistance is a controversial practice without a solid basis in scientific research. Fire ecology in moist forests is complex. Logging that opens the forest canopy increases solar penetration of the lower canopy and forest floor. Wind penetration also increases. This can cause drying and warming of fuels and soils. These conditions would result if moist forests were logged to a residual forest of the Lower Management Zone, for example. If there are important strategic fuel breaks or safety corridors in moist forests, please consider treating them using non-commercial hand thinning. Please do not include logging in moist forests.

Treatments in Riparian Habitat Conservation Areas (RHCAs)

The project document states that “only hand piling would be used within RHCAs” but does not describe proposed treatments within RHCAs. We recommend against commercial thinning/ logging in RHCAs. Leaving material in RHCAs - especially larger material - can help discourage access by cattle to the riparian area. Please analyze the potential to utilize woody material to benefit fish habitat and hydrology by placing woody material in-stream in strategic locations.

Fuel Breaks Along Roads Affect Wildlife





Please consult with the wildlife biologist on the design and implementation of fuel breaks along roads. The width of the roadside fuel breaks is described as ten feet on either side of the road prism, however, it is unclear how these roadside treatments may combine with adjacent fuel reduction thinning treatments. Roadside fuel breaks in combination with the roads themselves and adjacent treatments could have substantial implications for wildlife. While we support site-specific and strategic fuels treatments along open roads, it's critical that wildlife habitat areas include canopy cover, hiding cover, down logs, and other attributes of habitat for marten and other species.

Consider the Cumulative Effects of Logging of Private Industrial Forests

Nearby private industrial forests have been heavily logged over the past decade or so. Substantial acreage has been clear cut. This change in condition affects wildlife habitat and connectivity, fire ecology, forest structure and ecology, invasive plants, and more. Additionally, the local community has observed the extensive clear cut logging of local forests for economic purposes. This has heightened local concerns about forest management in general and commercial logging in particular. It's understood that this project does not propose clear cutting or other regeneration logging. However, the commercial logging component of this project will be questioned by members of the public who have seen the results of logging on nearby forests. At a minimum, please thoroughly analyze the cumulative effects of the heavily logged private lands in combination with the proposed commercial logging on the West Wall project.

Whitebark Pine (WBP)

Have botanists surveyed for WBP in the project area? Please disclose. We understand that this project appears to be at a lower elevation than the expected range for WBP, but it's important that whitebark pine be protected in all Forest Service projects.

Prescribed Fire

We appreciate the Forest Service including plans to implement prescribed fire within the project area. We very much support this approach as an important part of forest restoration. Understanding that special considerations and precautions for fire use must be observed in this project area close to the WUI and values at risk, we would like to see follow-up landscape/broadcast burning across the project, including as a follow-up after the piles are burned. Of course, this would only be possible with all possible considerations for public safety.

Marking Timber Sale Boundaries Before Environmental Analysis

We are aware that timber sale boundaries were marked in the project area prior to environmental analysis and the public announcement of the Categorical Exclusion. This gives





the appearance to the public that the ultimate outcome of the project has been pre-determined and undermines public confidence in the thoroughness of the environmental analysis. GHCC advocates for a thorough environmental review of projects proposed on public lands. We strongly request that the Forest Service thoroughly review the potential impacts of logging on the acres that were previously marked for logging as well as the entire acreage of the project. Thank you.

Limited Information About the Proposed Treatments

We appreciate that the public notice for the project contains information such as the proposed acres of forest prescriptions and information about roads. It is challenging, however, to provide informed comments on the proposed project without additional information such as the details about the silvicultural prescriptions, forest structural types, plant associations, RHCAs, wildlife considerations, and more. GHCC Senior Advisor Brian Kelly reached out to Deputy Fire Staff/ Project Lead Shaniko Cowie and Forest Silviculturist Roy Cuzick for additional information by phone. We very much appreciate their time discussing the project. We encourage the Forest Service to provide more information and detail in the public notices for upcoming projects.

Public Concern About the West Wall DFPZ Project

GHCC has received numerous communications from residents in the Pine Valley community expressing concern about the West Wall DFPZ project. Please consider our comments on this project to reflect some of the significant concerns of these local residents.

In Summary

In summary, as you proceed with developing this project, we recommend the following:

- Protect wildlife habitat connectivity areas.
- Identify previously unlogged forests and protect them from logging.
- Protect all large trees and all trees with old-growth characteristics.
- Do not use the amended Eastside Screens.
- Do not construct temporary roads.
- Do not log steep slopes or authorize tethered logging systems.
- Do not log in moist forests.
- Do not log in RHCAs.
- Analyze cumulative effects of this project in addition to heavily logged private lands in the vicinity.
- Create defensible fuel profile zones restricted to site-specific and strategic areas to benefit wildfire management and safety, primarily utilizing non-commercial hand thinning and prescribed burning.





Thank you for the opportunity to comment on this project. Please let us know if you have any questions.

Sincerely,

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