

[REDACTED] comments on the Huckleberry DFPZ Project

From: [REDACTED]

To: Whitney Tayer, Environmental Coordinator, Whitman Ranger District
Wallowa-Whitman National Forest, 1550 Dewey Ave., Suite A, Baker City, OR 97814

*Please note that our enclosed field survey sheets for a sample of existing conditions in the Huckleberry DFPZ project area are part of our comments, as well as the associated sale unit photographs, which are listed and described on the survey sheets. We may not be able to send you all or part of the photographs before the comment period ends.

Re: the Stated Purpose and Need for the Huckleberry DFPZ project:

The "need for safe evacuation routes" can be accomplished (as much as possible) by simply implementing non-commercial thinning up to 9" dbh, as any excessive density of trees throughout the project area is within that NCT size class less than 9" dbh, based on our field surveying. The whole area has been logged in some combination of high-grading, commercial thinning, and in the middle of sale units along highway 7, also already non-commercially thinned and still open in most of the sale units there. Further, the vast majority of young to mature and old trees are (in order of prevalence): Ponderosa pine, Western larch, and Douglas fir, all three of which are highly fire resistant—especially if they are allowed to grow into maturity and old growth. Not logging the younger and mature Ponderosa pine, Western larch, and Douglas fir that already have high live crowns and thickening bark would make the stands even more fire resistant if allowed to grow into the ≥ 21 " dbh size class. As it is, these existing stands are already relatively fire resistant, due to the tree species composition and the continuing effects of past commercial thinning breaking up the continuity of the canopy, with existing variable density and many openings.

We strongly recommend that the Huckleberry timber sale be changed to only non-commercial thinning up to 9-10" dbh and/or prescribed burning to reduce the small wood, which is the most flammable. Commercial thinning is really not necessary and should not be done in this project area. Science-based findings that commercial logging actually increases fire intensity and spread can be found below in our comments. The stands are already well set up for fire resistance, which was probably the Forest Service rationale for previous commercial thinning, non-commercial thinning, and prescribed burning.

Surely there is Biden administration funding for wild fire risk reduction or other funds that could be used to pay for non-commercial thinning and/or prescribed fire in Wildland Urban Interface zones. The Forest can not be endlessly expected to pay for non-commercial thinning and prescribed fire through commercial logging that is cumulatively destroying the forest ecosystem, critically needed wildlife habitat, and forest carbon sequestration and storage essential to retain for reducing catastrophic climate change effects, including more intense wild fire.

Where sale units are already tree-marked with orange paint to save those trees from logging, there are far more orange-painted trees than unmarked trees planned for logging. This is not the usual use of orange paint marking to save because a commercial timber sale in these sale units just doesn't make sense, due to all the past logging of mature and large trees and the commercial thinning already having created numerous gaps in the canopy.

The Forest Service needs to stop commercial logging on such short rotations as 30 years or less (the current rotation) with increasingly low basal retention on a landscape scale and stop removing mature

forest cover and large trees, which are more important than ever to retain viable forest ecosystems and maximize tree-based carbon sequestration and storage to help prevent a nightmare future for our children and grandchildren of prolonged droughts, extreme storms, unprecedented heat waves, more intense wild fires, and ecosystem collapse as 10-50% of all species are now expected by biologists, such as E.O. Wilson, to go extinct by the end of the century if Greenhouse gas emissions are not drastically reduced and natural carbon sinks, including intact mature forest ecosystems, are not preserved.

The plan to log "all trees" within ten feet of the roads seems to be an attempt to make a commercial timber sale pay for all the other work, such as non-commercial thinning and prescribed burning, which are far more effective for fire risk reduction than commercial logging, which is counter-productive. Even the pole-sized trees are below 9-10" dbh (I measured an average pole-sized tree in sale unit 16 and the average pole tree was only about 7.5" dbh) and could be non-commercially thinned or made available for public firewood cutting. The vast majority of any excess tree density that could increase fire intensity and spread is only denser patches of seedlings and saplings.

Further, the plan to log all trees within ten feet of the roads, including trees $\geq 21"$ dbh, would now be in violation of the Forest Plan Eastside Screens 21" dbh cutting limit, since none of the roadside trees that I saw were legitimate hazard trees, and since Judge Aiken ordered that the decision of the Region 6 Forest Plan amendment to enable large tree logging greater than the 21" dbh limit had to be vacated, which means that the 21" dbh limit is re-instated. I found and documented some of the roadside trees over 21" dbh marked blue to cut. See one of the survey sheets that documented a whole group of mature and old growth Ponderosa pine and Western larch, in which 5 of the 9 trees are over 21" dbh—if measured correctly, since the markings to cut were higher than 4' 6" as required. See also our photograph descriptions and recommendations for two old growth Ponderosa pines over 21" dbh that are marked to cut next to road 1090. There are probably more live, non-hazard trees marked to cut along the roads that are over 21" dbh, as I didn't survey the full extent of all the roads next to sale units or that access sale units. All the trees marked to cut that are 21" or larger have to be re-marked to save and not be logged.

Elements of the proposed management are inconsistent with the stated purpose and need for the Huckleberry DFPZ project through Forest Service failure to consider the findings of much current best available science and failure to disclose significant scientific controversy over Forest Service assumptions used to rationalize commercial logging, including for the creation and promised maintenance of "fuel" breaks being claimed "to reduce the risk of uncharacteristic wildfire" on federal land and private lands of local communities.

There are many current and recent science findings that dispute the idea that "fuel" breaks will reduce or stop "uncharacteristic" wildfire, such as climate change-driven fires, which the Forest Service ignores and excludes from disclosure in their public relations narrative. The following quotes are taken from the book, Smokescreen: Debunking Wildfire Myths to Save Our Forests and Our Climate by Chad T. Hanson, a research ecologist with a Ph. D. in ecology and the Director of the John Muir Project of Earth Island Institute. We recommend that you read this book in its entirety.

For example, take a close look at the 2018 Camp Fire in the northern Sierra Nevada of California and how it burned. Dr. Hanson relates that: "... the Forest Service issued a decision in 2011 to log more than 1,500 acres of public land adjacent to Paradise and Concow, explicitly telling the communities that this would protect them from a future fire." (footnote 8, p. 237) The Concow logging project removed 2 million board feet of commercial timber—in the form of live, mature trees—and carried out biomass logging across a large expanse within an earlier (2008) fire area, intensively logging and clear-cutting snag forests and removing thousands of tons of dead trees as commodities for incineration and energy

production in commercial biomass markets.” Yet “... the Camp fire destroyed more than 14,000 homes, and eight-five people lost their lives. One of the most immediate realizations was that most of the homes lost had already been in flaming ruins *before* the Camp Fire reached the towns of Paradise and Concow. Embers landed like a hail storm, thrown by winds for miles in advance of the flames.... An extensive investigation by the *Los Angeles Times* exposed the shocking ineffectiveness of wildland logging and chaparral removal conducted under the guise of creating ‘fuel breaks’ by state and federal agencies. 9 (Curt M. Bradley, Chad T. Hanson, and Dominick A. DellaSala, “Does Increased Forest Protection Correspond to Higher Fire Severity in Frequent Fire Forests of the Western USA?” *Ecosphere* 7, no. 10 (October 2016): article eo1492.) “During the hot, dry, gusty conditions that typically prevail during climate- and weather-driven fires, winds toss the firebrands for miles, right over these so-called fuel breaks and into surrounding towns. When the flames themselves reach the fuel breaks, they simply burn through them—often driven more intensely by logging slash debris, tree plantations, or invasive grasses spread by logging...” (p. 195)

“An entire neighborhood in the town of Paradise was destroyed by embers before the Camp fire even reached the area. Note the live green trees surrounding the remains of the burned homes. [re: a photograph of that incinerated neighborhood on p. 196] Once the Camp fire reached Paradise and Concow, it did not burn nearly as intensely as it did when it was spreading through the heavily logged areas surrounding the towns. This is why most of the trees in these towns were still green and only lightly scorched, which I witnessed firsthand.” (DigitalGlobe, 2018)

I also witnessed these conditions on the ground in Paradise not long after the fire. Thus “fuel breaks” are ineffective, especially under extreme climate change. Closer to home, keep in mind that the recent fire that jumped the McKenzie River to burn both sides of the waterway, torching intensely on the previously clearcut ridgelines of dense small trees from regeneration. Likewise, the Eagle Creek fire even jumped the Columbia River, which is about a mile wide.

As for the perceived “need” to commercially log, it’s not really about reducing fire risk but to pay for the kinds of management that could be more effective in reducing fire intensity (assuming that this management is still effective when a fire actually happens in that location, which is extremely unlikely statistically) such as non-commercial thinning up to 9” dbh and prescribed burning, which deal with the most flammable small biomass, and to placate timber lobbyists of a dwindling industry, due to extensive and intensive logging for about a century in eastern Oregon.

Logging under the guise of “thinning” not only is now usually virtual clearcutting, but also moving into less logged or never logged higher elevation moist mixed conifer forest that typically has ash soils with high moisture retention. Historically these forests have been at least partially protected as municipal watersheds protecting communities’ municipal water supplies and downstream abundant flows for fish, other aquatic species, and riparian ecosystems. Commercial logging and biomass removal don’t “create, restore, and maintain a fire-resistant landscape.”

Dr. Hanson describes the problems associated with mature tree logging for presumed associated forest fire risk reduction: “A typical thinning project kills and removes the majority of trees in a given stand, including many mature trees and even some old-growth trees. In addition to leaving behind combustible slash debris, this reduces the cooling shade of the forest canopy, creating hotter and drier conditions on the forest floor and stimulating the growth of understory grasses, shrubs, and small tree that can readily carry flames. Further, in these thinned areas, the winds that drive wildland fires can move through the forest more rapidly, and the fires often burn more intensely because there are fewer trees to buffer and slow the winds.” (pp. 15-16) These conclusions were also found in a Sierra Nevada study.

The Purpose and Need for the Huckleberry DFPZ project says that: "The primary purpose of this project is to establish and maintain fuel breaks to reduce the risk of uncharacteristic wildfire on both Federal land and the Sumpter Valley community." (p. 1) Scientists also dispute the assumption that biomass reduction and removal reduces fire risk: "In addition, the biomass logging industry fails to mention that, by removing vital nutrients in trees and compacting soils with heavy machinery, logging substantially reduces the carbon sequestration and storage capacity of the forest. Logging-related soil compaction alone can reduce forest carbon sequestration and storage capacity by 30 percent, and reductions of 50 to 75 percent sometimes occur. 34 Carbon sequestration and storage capacity losses of an additional 15 percent or more can result from nutrient removal from the ecosystem. 35" (34. William J. Elliot et al., "The Effects of Forest Management on Erosion and Soil Productivity," Symposium on Soil Quality and Erosion Interaction, Keystone, CO, July 7, 1996) (35. J.D. Walmsley et al., "Whole Tree Harvesting Can Reduce Second Rotation Forest Productivity," *Forest Ecology and Management* 257 (2009): 1104-11.)

Further: "Scientific studies have found that only about one-fifth of the wood in trees removed by logging makes its way into lumber products that temporarily store carbon in buildings. 36" (36. Tara W. Hudiburg et al., "Meeting GHG Reduction Targets Requires Accounting for All Forest Sector Emissions," *Environmental Research Letters* 14 (2019) article 095005; Ann Ingerson, *U.S. Forest Carbon and Climate Change* (Washington, DC: Wilderness Society, 20007).

"Importantly, in the forests of the United States, logging causes ten times more CO₂ emissions than the combined emissions from wildland fires and tree mortality from drought and native bark beetles. 38 (38. N.L. Harris et al., "Attribution of Net Carbon Change by Disturbance Type across Forest Lands of the Conterminous United States," *Carbon Balance Management* 11 (2016): article 24.

Yet wildfires are portrayed as the larger source of CO₂ emissions than the process of logging, which is the biggest source of CO₂ emissions in Oregon. "Overall, logging in US forests causes 617 million tons of CO₂ emissions each year, 39 with an additional 106 million tons of indirect CO₂ emissions due to transportation associated with logging. 40 Moreover, while US forests sequester 1.66 billion tons of CO₂ each year, logging is preventing that figure from being at least 30 percent higher because of logging-related soil damage and nutrient removal and the conversion of mature forests to young tree plantations. 41 The overall impact of logging in US forests is more than 1 billion tons of CO₂ each year, or about the same as the overall effect of coal production." (p. 95) (39. Harris et al., "Attribution of Net Carbon Change by Disturbance Type." 40. Ingerson, *U.S. Forest Carbon and Climate Change*. 41. Elliot et al., "Effects of Forest Management on Erosion and Soil Productivity", W.R. Moomaw et al., "Intact Forests of the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good," *Frontiers in Forests and Global Change* 2 (2019): article 27.

The Forest Service urgently needs a paradigm shift to abandoning commercial logging and biomass removal as its dominant mission. Forest carbon sequestration and storage in trees can continue for up to hundreds of years if the trees are allowed to grow into old growth, become a snag, and persist as a log storing carbon. As James Hanson, a well known climate scientist has pointed out, it is critical not just to end the use of fossil fuels, but also to preserve natural carbon sinks, including the oceans and forests, to keep global warming increases to 1.5 degrees Celsius or to bring CO₂ levels down. Retention and maximization of forest carbon sequestration and storage is necessary to reduce climate chaos for future generations, to help stop mass species extinctions, and to avoid the break down of ecological processes and functions that support life on Earth.

So in the context of the science cited above and abundant field evidence, the forest stands are generally more at risk of greater fire intensity and spread due to logging removal of more fire-resistant mature and large trees. As noted in our survey sheets, to allow these stands to become more fire resistant, it's necessary to let most of the younger-mature trees and all of the mature trees to grow larger for accomplishing greater fire resilience; more support for declining wildlife species that require mature, large, and/or old tree structure; and to maximize forest carbon sequestration and storage to reduce extreme global warming events, such as climate-driven wildfire. That's a win-win-win scenario if commercial logging and excessive biomass removal is avoided.

Another science finding that calls to question the effectiveness of so-called "Defensible Fuel Profile Zones" or "fuel breaks" in general is that there is an extremely low chance of "fuel breaks" being effective when a fire actually occurs in the area that had biomass removal. It is very unlikely that the Forest Service would "maintain" all the DFPZs and "fuel" breaks every 10-15 years, as there is no guaranteed funding for this and the Forest Service prioritizes commercial timber sales.

When mature trees are removed by logging, this stimulates re-growth of far more flammable young small trees that will grow in densely, as can be seen in the Huckleberry project area, where the only exceptional density is due to seedlings and saplings that regenerated after past overstory removal from commercial thinning and/or high-grading.

The following purpose and need statement on p. 1 can be met without commercial logging and excessive ground disturbance and biomass removal: "The purpose and need for this project can be accomplished by creating Defensible Fuel Profile Zones (DFPZs); strategically placed treatments along roads and ridgetops where tree densities, canopy base heights, surface fuel loadings and ladder fuels are reduced to modify fire behavior and provide a safe place for firefighters to initiate fire suppression activities." (p. 1) Instead of the current proposed action, the Forest Service can and should drop all the commercial logging, as the commercial thinning has already happened and still has open stands and variable density stands, with the only exceptional density being seedlings and saplings and some pole-sized trees. These could be thinned non-commercially or for a biomass buyer. However, the "energy efficient" biomass pellets are a false solution for reducing Greenhouse gas emissions. The sale units along highway 7 are already commercially thinned, high-graded, and mostly non-commercially thinned. There's no need to be "favoring fire resistant tree species" as the three most prevalent tree species are all known to be very fire resistant, especially if allowed to become large and big. Most forest in the area has already been converted into Ponderosa pine plantations already, with some of the Western larch and Douglas fir left already becoming mature, with high live crowns and virtually no low branches. The larger they grow, the more fire resistant they become, as the bark grows thicker with age and the live canopy moves higher.

The only reduction of existing "fuels" (biomass) and live "fuels" that favor torching and crown fire throughout the project area are really just seedlings and saplings. There's already many gaps in the overstory canopy from past logging, so the canopy does not lend itself to extensive crown fire. In some cases, such as in sale unit 17, there are some patches of down logs from likely bark beetle infestation or heat stress from growing too close together on marginal soils. However, this is mostly the exception, and the area needs more snags and logs for wildlife. So non-commercial thinning and/or prescribed burning could be useful in achieving the purpose and need goals.

This is what we recommend: changing plans from commercial logging to just using non-commercial thinning and prescribed burning, only where really needed. Examples of sale units that really don't need anything done for fire risk reduction include all or most of the sale units along highway 7 that are already

open mature stands of mostly or all Ponderosa pine. In a few cases, there area also fire-resistant Western larch and Douglas fir, as in sale unit 3, which is probably more reflective of the tree species mix that was there historically, judging by the many fir and larch stumps in many sale units.

Re: the Proposed Action:

- *Drop all commercial thinning of mature trees, both ground-based and cable assisted. Even the ground-based sale units are not likely to be economical to log commercially, let alone the cable-assisted logging. See our other reasons for opposing commercial logging above.

- *Drop planning to log all trees within 10 feet of the roads. The Forest Service must at least retain all the trees equal to or larger than 21" dbh. All trees marked to cut in RHCA buffers should not be removed. Trees for felling into creeks or floodplains should be limited to up to 15" dbh to allow for growth of trees to large, more fire resistant trees. See our survey sheet describing a group of 9 trees within the Trout Creek RHCA buffer that are all marked to cut although none of them are hazard trees and 5 of them are over 21" dbh—near sale unit 18 and the junction of road 1100 and Trout Creek.

- *Drop all proposed 11 segments of "temporary" roads over a total of 2.4 miles. "Temporary" roads are seldom effectively closed and fully decommissioned. Usually they are "stored" for future use as "existing disturbance" for re-use in the next timber sale in the area, becoming a de facto system road. Further, "temporary" roads fragment forest habitat and increase access for livestock damage, illegal firewood cutting, ATV incursions, fur trapping, and introduction and dispersal of invasive exotic plants. We are opposed to all "temporary" road construction and to re-opening of closed roads that are not being maintained for seasonal use.

- *There really aren't that many blind corners on these roads except for road 1170, which are in the midst of incredibly dense non-commercial thin size Ponderosa pine plantations. The highest priority should be non-commercial thinning and later prescribed burning of these dense Ponderosa pine thickets from past clear-cutting and over-planting—which are also nearest to the private lands that may be residential.

Re: the Riparian Habitat Conservation Areas: We support legitimate riparian restoration to meet riparian management objectives. Any trees felled within RHCA's should not be removed. Given the shortage of large and old trees throughout the project area, there should be no felling of trees greater than 14-15" dbh into Clear Creek, Trout Creek, and their tributaries. This would allow for retaining large trees in RHCA's, which triples their wildlife diversity and retains large trees for future ongoing stream recruitment and floodplain roughness, as well as for increasing large tree carbon sequestration and storage. Wherever possible, trees should be tipped into creeks and tributaries with root wads attached for greater fish habitat complexity, pool formation, sediment catchment, or to cause greater meandering of the stream channel and for slowing severe storm surface runoff effects to streams.

Re: Table 2:

- *Drop all 1,926 acres of ground-based commercial thinning. Overall, a commercial timber sale would be both ecologically destructive and uneconomical.

- *Drop all 350 acres of cable-assisted steep slope logging, which could increase erosion, endanger loggers, and be ecologically destructive and uneconomical.

- *Non-commercial thinning over 689 acres (or less) is acceptable and could increase human safety in the event of a fire occurring during the limited time span of effectiveness. We prefer more hand piling and

little to no machine grapple piling, as that causes more ground disturbance and more loss of down wood habitat.

* We support prescribed burning after the non-commercial thinning under appropriate conditions of humidity, ambient air temperature, and wind speeds. We oppose prescribed burning during the spring reproductive season for plants and wildlife. However, the Umatilla National Forest on the Heppner District successfully implements prescribed burning before full snow melt and before the spring reproductive season starts, which we support.

*Scale down the felling of roadside trees within 10 feet of the road to only legitimate hazard trees and trees less than 15" dbh. This would allow more mature trees to grow into large and old trees and maintain scenic views. This is an area with high recreational use, including ATV riding, camping, hunting, and fishing.

*Scale down the road-side logging by doing more pruning of lower branches of mature trees for better sight distance and fire resistance. This would also retain more recreational values and wildlife habitat. There is no real need for clearing 10 feet from the outer edge of turnouts. Pruning of lower branches could also accommodate better sight distance on blind curves, rather than cutting down all the trees within ten feet from the road on blind curves.

*See our other comments on our sample field survey sheets.

Re: the Categorical Exclusion:

The Forest Service chronically neglects to acknowledge and disclose the scientific controversy over their use of "Condition Classes" and "Fire Regime Groups", which have been found to be inaccurate use of the science.

Under the CE authority, "The project maximizes retaining old growth and large trees", which is not done by logging or felling large trees $\geq 21"$ dbh, which also fails to increase large and old tree abundance by logging trees $\geq 15"$ dbh, which cumulatively prevents the majority of the forest from developing more large and old trees for wildlife habitat, fish habitat, recreational values, and maximizing carbon sequestration and storage to reduce extreme climate change effects. There's a great deficit in large and old trees in this project area compared to historical conditions. The lack of large and old trees and the many large stumps attest to past logging removal. This deficit amplifies the need to retain all large trees $\geq 21"$ dbh except for legitimate roadside hazard trees, and to retain most or all trees $\geq 15"$ dbh to restore historic levels of large and old trees, which are also the most fire resistant trees.

Many wildlife species dependent on large tree structure are in decline, including Management Indicator Species, including Primary Cavity Excavating woodpeckers such as Sensitive-listed Lewis' woodpecker and White-headed woodpecker, as well as MIS American marten, which is ranked as Vulnerable in Oregon. Sensitive-listed Pacific fisher require large firs for cavity denning and big log runways through the forest. Pileated woodpecker may be starting to decline due to logging targeting their habitat, as well as the focal species, Great Gray owl. I saw or heard two primary cavity excavating woodpeckers, with a sighting and photographs of a female Blackbacked woodpecker in sale unit 17, and hearing a Hairy woodpecker.

We are also concerned that there are very few large or old growth snags and logs for woodpecker species, as well as very little abundance of snags, which Blackbacked woodpeckers require, along with abundant down and elevated logs for winter foraging. A Northern Flicker was heard in sale unit 17. Northern Flickers are in decline and an MIS Primary Cavity Excavator. There were signs of elk in

various sale units: elk scat and/or elk tracks and elk/deer trails were found in sale units 16, 18, 15, and 3. Elk select for greater tree density for hiding and thermal cover. Too much tree removal could leave the sale unit habitat unsuitable for elk. I also saw and photographed a Mule deer doe in sale unit 17, looking very malnourished.

Thank you for your opportunity to submit additional comments. Please let me know what extraordinary circumstances are being considered during analysis and the decision-making process, and your conclusions. Please keep me informed of all developments and changes with the Huckleberry DFPZ project.

Unfortunately, I won't be able to send you all the photographs I took in the sale units before the comment deadline, but they are described by timestamp on each survey sheet. Let me know if you would like me to send you all or most of the photos when I am able to send them to you.

I don't have any regular or easy internet access from April until early November. Please contact me with any questions or new developments via my voicemail [REDACTED]

Thank you for consideration of our comments.

[REDACTED]

[REDACTED]
[REDACTED]

1) Pole size trees that are dense - up to about 10-12" dbh could be felled & left for firewood - a current use.
2) Leave healthy patches of PP & WL seedlings & saplings for elk & deer hiding cover & recreational privacy & aesthetics, while breaking the continuity of the patches.
Don't cut or net any Western larch.

Recommendations

for sale unit: ☒ DROP CUTTING.

Already very open except for some dense patches of NCT - size seedlings & saplings & some sale-size trees. NCT to 9-10" dbh only.

Subjective evaluation of area:

This is a high recreational use area with two well-used Hunters' camps with deer racks, fire rings, & considerable bare ground from vehicles, as well as an ATV/motorcycle trail through the sale unit. Preserve recreational aesthetics & healthy

Roadless area ☐ Never logged ☐ Plantation ☐ Many old growth logs and snags patches of WL & PP
Old growth/mature forest: mostly younger - mature to mature PP & WL w/ very few OG PP seedlings
Average tree size in "dbh": Most density = < 9" dbh, w/ some pole-sized tree density, mostly seedlings
Examples of large tree diameter: 28.9" PP, 26.6" PP, 26.3" PP
of old growth trees per acre: Not enough large trees and OG snags & logs for an OG count

☒ Previously logged approx. age of trees? Hard to tell, as not many OG stumps. Firewood cutting

Describe marking to cut: same

Former logging sign (skid trails, stumps, lack of regen., dense overstocked spindly thickets), describe: younger - mature to mature stumps, fresh cut stumps from firewood cutting

Mixed conifer, specify species and number in descending order of prevalence: ☒ Ponderosa Pine

☒ Juniper (1 seen) ☒ Doug Fir ☒ Western Larch ☐ Grand Fir ☐ Lodgepole Pine ☐ Engelman Spruce ☐ Subalpine Fir ☐ Yew ☐ Mt. Mahogany ☐ Aspen ☐ Willow ☐ Alder ☐ Shasta Red Fir ☐ Sugar Pine ☐ White Pine ☐ Incense Cedar ☐ other:

Tree seedlings (species, quantity): patches of denser WL & PP seedlings & saplings in openings

Quality and type of canopy closure, %: generally low due to many openings w/ little to no canopy, including barren areas in & around 2 hunters' camps, also an ATV trail

Historically natural mixed-conifer site: old growth mixed-conifer, fire scars, north slope, moist area, high elevation, describe: Looks PP/WL larch dominant, w/ fairly dry PAB? Snowberry, Elk sedge, & Pine grass

% of defoliation - species and age of trees affected: Mostly very green & healthy, hardly any snags & down wood except for logs cut for camp fire wood

Species evident using area for habitat/forage (scat, tracks, sightings, calls, foraging/nesting, roosts, dens, burrows, beds, hives, etc.): Western Tanager heard, a Raven seen, Night hawks heard, a Ruffed grouse seen, a pale orange butterfly (small, w/ gray), mosquitoes, elk tracks, an elk/deer trail, Hermit Thrush heard, Wilson's Warbler heard, hairy woodpecker heard, Bobcat scat, a likely Sawwhet owl heard in the night while camping here

Riparian area in or adjacent to area/unit(s) (springs, seeps, drainage headwaters, seasonal runoffs, creeks, rivers, lakes, ponds) describe: None seen. This sale unit may have been reduced in size, based on the boundary markers.

Riparian buffers? Adjacent steep slopes?

Unusual plants? None seen

Plant community types: Snowberry, Elk sedge, Pine grass

Soil type, quality, compaction level(s): Light tan ash

Typical plants: Birchleaf spirea, Knickknick, Hawkweed, Wax currant, wild Strawberry, Thinleaf lupine, Oregon grape, yarrow, Knickknick, Pussytoes, Paintbrush (red), Oregon checker mallowroot.

Steepness of slope/aspect of slope (direction it faces): only mild slopes around a flat area w/ gently sloping Southern aspect

Landslide risk, describe: N/A

Density of roads (per sq. mi): without section lines, I can't calculate road density, but nearby

Effects of livestock grazing: Cow pies. Barren ground in center seems to be mostly from hunters'/campers' traffic

Evidence of Animal Damage Control activities: None seen

Evidence of bait stations for hunting, hunters' camps: 2 hunters' camps in the middle of the sale unit w/ deer racks & fire rings.

Mining ☐ Herbicide spraying ☐ Gopher trappings/poison ☐ Other: ☐

Exotic weeds seen: None seen. An ATV/motorcycle trail runs through the sale unit w/ tire tracks

Recreational use: Hunting. Also I picked this spot for camping due to off rd 1100 & lovely

Describe sale unit overall: The fire hazard from dense NCT size trees is evident, but both Ponderosa pine & Western larch are very fire resistant & already the younger-mature P. pines & W. larch have high crowns & lack lower branches & are not dense. Leave the

Surrounding area: ☒ contiguous forest ☒ high-graded forest ☐ never logged area ☐ canyon healthy

☐ roadless area(s) ☐ wildlife corridor ☐ meadow ☐ grassland ☐ rocky upland ☐ fire-resistant

☐ high desert ☐ seedlings ☒ pine plantations ☐ clear cut ☐ other cut: y/m to mature PPs & WL

☒ public land, agency FS ☒ private land, ownership further So down rd 1100 & off rd 1170 to SE

riparian (specify):

area of human habitation - possibly on the private land

Species seen adjacent to sale unit: 19:04 opening w/ NCT density & denser (2) 19:07 - an elk

Photo guidelines: unusual plants/animals, wildlife, old growth canopy-dependent species evidence, nest holes, foraging, burrows, canopy in green sales, riparian areas without buffers, relative severity of burn if fire salvage sale, old growth grove, cattle damage, cumulative impacts of former logging, healthy mixed-conifer, etc.. Minimize number of photos. Draw map of unit & show differences in different areas e.g. Location of old growth, riparian areas, significant wildlife sightings, sensitive plant & exotic weed locations. Identify camera used. 18:18-18:19 my camp w/ truck & tent in

Photo #s & descriptions: the middle of sale unit in the hunters' camp further from rd 1100.

copies of better Hackleberry DPP2 map in case I lose it: 18:20-18:23
18:26 Boundary sign for sale unit 16 18:34 elk scat in the sale unit (all photos listed are in #16)
18:37 fresh firewood cut stumps 18:39 - boundary marking looking into sale unit w/ variable density w/ openings, mostly younger-mature to mature Ponderosa pines
18:39 - already open y/m-m stand w/ high crowns - looks thinned (eted) already
18:39 - similar open stand but w/ more NCT size density of seedlings & saplings, w/ boundary marker at right, facing in. 18:40 - another boundary marker
18:40 - healthy younger-mature W. larch & P. pine that should be allowed to grow larger (& thus even more fire-resistant) 18:40 - view of about the same area but showing shrub layer, still open 18:44 - the 2nd hunters' camp nearer rd 1100, w/ deer rack
& 18:45 - same hunters' camp w/ fire ring & showing lots of bare ground "fuel" (bioma breaks inside the sale unit 18:45 - more mature healthy W. larch
18:48 - lots of open, barren ground in the center of the sale unit around the hunters' camp further from rd 1100 where I camped, w/ deer rack
18:50 pole-sized P. pine density near rd 1100 18:52 - more open stand
18:52 same more pole-sized density 18:52 ATV tracks on an ATV/motorcycle trail in the sale unit 18:54 - motorcycle tracks on the same trail
18:55 - green more mature P. pine canopy around an opening healthy.
18:56 motorcycle tracks on the ATV/motorcycle trail
18:57-19:00 denser NCT size seedlings & saplings that could be thinned
19:01 - a 28.9" dbh 06 P. pine w/ dbh tape 19:02 higher crown of the 28.9" PP

- Beautiful diverse plants & shrubs. * Buffer woodpecker nest holes in m-OG snags & buffer OG logs.
 * Leave denser patches of younger-mature to mature PP's further away from the road
 * Consider pruning lower limbs of mature P. pines near access road instead of logging them
 * Save m-OG snags not near the road for wildlife-walk managers to save. Also OG logs (large)

Recommendations

for sale unit: NOT only - up to 10 dbh

or limit CTing up to 14" dbh to allow for future growth of large old trees now at a deficit compared to historic conditions. Save more m-trees.

DATE June 8th, 2024

NTL FOREST Wallawia-Whitman

DISTRICT Whitman

PROJECT Huckleberry DFZ

UNIT 17

SURVEYOR'S NAME

Subjective evaluation of area: Orange-bark mature Ponderosa pine should all be retained as there is a need to retain mature Ponderosa pine to grow large & old for wildlife habitat, carbon sequestration & storage, & recreational values. There is no good reason to log fire-resistant

Roadless area Never logged Plantation Many old growth logs and snags mature trees.

✓ Old growth/mature forest: mostly younger-mature to mature due to past CTing & highgrading

Average tree size in "dbh": variable - mostly younger-mature < 15" dbh

Examples of large tree diameter: 24.9", 28.7" (both P. pine)

of old growth trees per acre: No OG count due to not enough live trees ≥ 21" dbh & OG snags in 1 acre

✓ Previously logged approx. age of trees 8:59 - past CTing & highgrading / m-OG stumps

Describe marking to cut: orange marking to save for this sale / Also NOT stumps

Former logging sign (skid trails, stumps, lack of regen., dense overstocked spindly thickets), describe:

Mixed conifer, specify species and number in descending order of prevalence: ✓ Ponderosa Pine

✓ Juniper Doug Fir Western Larch Grand Fir Lodgepole Pine Engelman

Spruce Subalpine Fir Yew ✓ Mt. Mahogany Aspen Willow Alder

Shasta Red Fir Sugar Pine White Pine Incense Cedar other:

Tree seedlings (species, quantity): almost all Ponderosa pine, w/ a few Juniper & 1 GF seen

Quality and type of canopy closure, %:

Historically natural mixed-conifer site: old growth mixed-conifer, fire scars, north slope, moist area, high elevation, describe: Looks Ponderosa pine dominant w/ a dry PAG

% of defoliation - species and age of trees affected: some but little in PP seedlings, some dead tops in younger-mature to mature Ponderosa pine

Species evident using area for habitat/forage (scat, tracks, sightings, calls, foraging/nesting, roosts,

dens, burrows, beds, hives, etc.): a chipmunk seen, Western Tanager heard, Raven heard,

Robins, an un/ded bird song heard, a woodpecker nest hole in a m PP snag - 9:18 (12)

Cassin's Finch heard, another woodpecker nest hole in a m PP snag - 9:20 (12)

Blue birds heard, Night hawk heard, Northern Flicker heard, a Swallowtail butterfly,

woodpecker bark scaling - normally Black backed or white-headed woodpecker

Riparian area in or adjacent to area/unit(s) (springs, seeps, drainage headwaters, seasonal runoffs,

creeks, rivers, lakes, ponds) describe: adjacent dry meadow to SW/south

Black backed woodpecker - likely female - in the sale unit below rd 1100f 10:49 - 10:53

Wildlife, cont.: likely Pygmy nuthatch heard, a Mule deer doe in the sale unit 10:17 - 18

Robert scat, Glee web spiders, a likely hairy woodpecker heard, a small blue

Riparian buffers? Adjacent steep slopes? White breasted nuthatch heard

Unusual plants? 8:50-51 - un/ded plant 9-10" tall, small flowers at top of stems, leaves w/

Plant community types: Snowberry, Bitterbrush, Elk scoby, Pinegrass

Fescue, limited Sagebrush

Soil type, quality, compaction level(s): mostly clay (4:23) (12) some light tan ashy topsoil

Typical plants: wild Rose, wild Hyacinth, Wax currant, Lemonweed, OR geyser,

Green Rabbitbrush, Thistleleaf lupine, Serviceberry, Agoseris sp., OR Sunflower

Arrowleaf Balsam root, Paintbrush, Hawkweed, Smokey Plume (Aronia), yarrow

Rosy pumpkins, Steaky Vioquefoil, wild 2:15, 2:30, 2:45, 2:50, 3:00, 3:10, 3:20, 3:30, 3:40, 3:50, 4:00, 4:10, 4:20, 4:30, 4:40, 4:50, 5:00, 5:10, 5:20, 5:30, 5:40, 5:50, 6:00, 6:10, 6:20, 6:30, 6:40, 6:50, 7:00, 7:10, 7:20, 7:30, 7:40, 7:50, 8:00, 8:10, 8:20, 8:30, 8:40, 8:50, 9:00, 9:10, 9:20, 9:30, 9:40, 9:50, 10:00, 10:10, 10:20, 10:30, 10:40, 10:50, 11:00, 11:10, 11:20, 11:30, 11:40, 11:50, 12:00, 12:10, 12:20, 12:30, 12:40, 12:50, 1:00, 1:10, 1:20, 1:30, 1:40, 1:50, 2:00, 2:10, 2:20, 2:30, 2:40, 2:50, 3:00, 3:10, 3:20, 3:30, 3:40, 3:50, 4:00, 4:10, 4:20, 4:30, 4:40, 4:50, 5:00, 5:10, 5:20, 5:30, 5:40, 5:50, 6:00, 6:10, 6:20, 6:30, 6:40, 6:50, 7:00, 7:10, 7:20, 7:30, 7:40, 7:50, 8:00, 8:10, 8:20, 8:30, 8:40, 8:50, 9:00, 9:10, 9:20, 9:30, 9:40, 9:50, 10:00, 10:10, 10:20, 10:30, 10:40, 10:50, 11:00, 11:10, 11:20, 11:30, 11:40, 11:50, 12:00, 12:10, 12:20, 12:30, 12:40, 12:50, 1:00, 1:10, 1:20, 1:30, 1:40, 1:50, 2:00, 2:10, 2:20, 2:30, 2:40, 2:50, 3:00, 3:10, 3:20, 3:30, 3:40, 3:50, 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Steepness of slope/aspect of slope (direction it faces): mild SW/W & SW/S slopes

Landslide risk, describe: N/A

Density of roads (per sq. mi):

Effects of livestock grazing: cow pies

Evidence of Animal Damage Control activities:

Evidence of bait stations for hunting, hunters' camps: 2 hunters' camps off rd 1100 just east south of this sale unit by 9 miles - likely hunting throughout the area

Mining ☐ Herbicide spraying ☐ Gopher trappings/poison ☐ Other:

Exotic weeds seen: Canada thistle (1) by rd 1100

Recreational use: ATV tracks & truck tracks on rd 1100, likely hunting, an ATV passed by on rd.

Describe sale unit overall: Mostly younger mature Ponderosa pine - most density is NOT size or up to 12-14" dbh at the most. Not NOTing to 10-12" dbh would be sufficient to reduce fire risk significantly. It's already been graded & NOTed & high graded in the past. Already

Surrounding area: ☒ contiguous forest ☒ high-graded forest ☐ never logged area ☐ canyon ☐ roadless area(s) ☐ wildlife corridor ☐ meadow ☐ grassland ☐ rocky upland ☐ high desert ☐ seedlings ☒ pine plantations ☐ clear cut ☐ other cut: 8 openings. Leave
☒ public land, agency ES ☒ private land, ownership all in OG snags for Blackbacked Woodpeckers & Flicker.
riparian (specify):
area of human habitation? N. Flicker

Species seen adjacent to sale unit: a Pileated woodpecker heard near the sale unit to the north across rd 1100

Photo guidelines: unusual plants/animals, wildlife, old growth canopy-dependent species evidence, nest holes, foraging, burrows, canopy in green sales, riparian areas without buffers, relative severity of burn if fire salvage sale, old growth grove, cattle damage, cumulative impacts of former logging, healthy mixed-conifer, etc.. Minimize number of photos. Draw map of unit & show differences in different areas e.g. Location of old growth, riparian areas, significant wildlife sightings, sensitive plant & exotic weed locations. Identify camera used.

Photo #s & descriptions: 8:44 Boundary marker by rd 1100, Need
8:57 Paintbrush (red) in bloom 9:01 opening w/ an OG snag, an OG PP marked to save
9:14 - an OG PP stump w/ fire scar w/ clipboard for scale 9:18 & 9:20 - woodpecker nest holes
9:23 - Wild Hyacinth flowers 8:59 - past high grading & OTing stumps in 2 m P. pine snags
9:32 - another OG PP stump w/ clipboard 9:35 - stand self-thinning, likely from Pine bark
9:37 - more stand self-thinning 9:39 & 9:40 - Monument p. land beetle in the past salvage
9:42 & 9:44 - woodpecker bark scaling in flower or root rot
1) on a Y/M PP snag & 2) on a M PP snag 9:46 - an OG PP fire scar snag, 2) w/ 2 nest holes -
9:58 - ext to a 18.8" dbh P. pine w/ a 19.3" dbh PP on the left not marked to save despite
mature P. pine resistance to fire & no substantial lower branches & further from the road
& 2) green higher crowns (more fire resistant on both trees - the 19.3" & 18.8" PPs of 9:58)
10:07 - (2) - a 24.9" dbh OG Ponderosa pined wildlife "character" tree marked to save
10:10 - (3) Ponderosa pine naturally grown in "clumps" or groups - yet only one of these is marked
to save though all of them have green crowns - This is an outdated logging practice.
10:17 - 10:18 - a Mule deer doe (skinny) hiding in trees then briefly coming closer
10:21 adjacent dry meadow 10:32 - an OG P. pine cut log w/ fire scar - what used to be
10:49 - 10:53 - a female Blackbacked woodpecker seen foraging on a 7.0 m PP below rd. 1100

* There is a separate survey sheet for sale unit 182 Trout Creek

* The 21" dbh limit for logging (or felling) has been reinstated as an enforceable standard by
Recommendations for sale unit: [REDACTED] DATE June 8th, 2024 Judge Aiken,
NTL FOREST Wallonia-Whitman
DISTRICT Whitman
PROJECT Huckleberry DPPZ
UNIT 18 (may be adjacent see back →)
SURVEYOR'S NAME [REDACTED]

* DROP all markings to cut
re-paint over) of trees $\geq 21"$ dbh
within 10 feet of the road or
anywhere else! (see photos on back)

Subjective evaluation of area: The Forest Service is not allowed to log all trees within 10 feet
of the roads if they are $\geq 21"$ dbh, as this violates the reinstatement of the 21" dbh enforceable
Forest Plan standard. This group of trees (11:33 - all marked to cut) also are marked to cut as
Roadless area ☐ Never logged ☐ Plantation ☐ Many old growth logs and snags they should be
Old growth/mature forest: ☐ within the Trout Creek RHCA buffer.

Average tree size in "dbh": Right to left in group photo of 11:33 left to right:
Examples of large tree diameter: all marked blue to cut adjacent to rd 1100: 28.4" PP, 23.3" WL,
of old growth trees per acre: 21.6" PP, 21.1" WL, & 23.8" PP - all of this group should
not be felled or logged as they also should be in the Trout Creek RHCA buffer.

Previously logged approx. age of trees
Describe marking to cut: Blue marking to cut trees $\geq 21"$ dbh is a violation of the 21" rule.
Former logging sign (skid trails, stumps, lack of regen., dense overstocked spindly thickets), describe:

Mixed conifer, specify species and number in descending order of prevalence: ☒ Ponderosa Pine
☐ Juniper ☐ Doug Fir ☒ Western Larch ☐ Grand Fir ☐ Lodgepole Pine ☐ Engleman
Spruce ☐ Subalpine Fir ☐ Yew ☐ Mt. Mahogany ☐ Aspen ☐ Willow ☐ Alder
☐ Shasta Red Fir ☐ Sugar Pine ☐ White Pine ☐ Incense Cedar ☐ other:

Tree seedlings (species, quantity):

Quality and type of canopy closure, %:

Historically natural mixed-conifer site: old growth mixed-conifer, fire scars, north slope, moist
area, high elevation, describe:

% of defoliation - species and age of trees affected:

Species evident using area for habitat/forage (scat, tracks, sightings, calls, foraging/nesting, roosts,
dens, burrows, beds, hives, etc.): Western Wood Pewee heard, Robins,

Riparian area in or adjacent to area/unit(s) (springs, seeps, drainage headwaters, seasonal runoffs,
creeks, rivers, lakes, ponds) describe: Trout Creek is a major perennial creek w/ good
flow, a big culvert under rd 1100 & good riparian hardwood shading
See 12:18-12:20 photos showing the proximity of this group of trees marked to cut (in 11:33+)
to Trout Creek - the nearest tree to Trout Creek marked to cut = only about 21 paces
Riparian buffers? Adjacent steep slopes? Trout Creek should have a 150-300 ft buffer
Unusual plants? under the INFISH/PACFISH buffers
Plant community types:

Soil type, quality, compaction level(s):

Typical plants:

Steepness of slope/aspect of slope (direction it faces):

Landslide risk, describe:

Density of roads (per sq. mi):

Effects of livestock grazing:

Evidence of Animal Damage Control activities:

Evidence of bait stations for hunting, hunters' camps:

Mining _____ Herbicide spraying _____ Gopher trappings/poison _____ Other: _____

Exotic weeds seen:

Recreational use:

Describe sale unit overall: *Not a sale unit - res. roadside tree marking to cut*

Surrounding area: _____ contiguous forest _____ high-graded forest _____ never logged area _____ canyon
_____ roadless area(s) _____ wildlife corridor _____ meadow _____ grassland _____ rocky upland
_____ high desert _____ seedlings _____ pine plantation _____ clear cut _____ other cut: _____

public land, agency _____ private land, ownership _____

✓ riparian (specify): *Trout Creek where it crosses below rd 1100*

area of human habitation _____

Species seen adjacent to sale unit:

Photo guidelines: unusual plants/animals, wildlife, old growth canopy-dependent species evidence, nest holes, foraging, burrows, canopy in green sales, riparian areas without buffers, relative severity of burn if fire salvage sale, old growth grove, cattle damage, cumulative impacts of former logging, healthy mixed-conifer, etc.. Minimize number of photos. Draw map of unit & show differences in different areas e.g. Location of old growth, riparian areas, significant wildlife sightings, sensitive plant & exotic weed locations. Identify camera used: *Canon 11:33 (2) group of ~~the~~ Ponderosa pines + a W. Larch*

Photo #s & descriptions: *at intersection of rd 1100 & 910 within what should be the RHCA of Trout Creek. No trees are supposed to be cut within RHCA buffers & these Ponderosa pine could have some lower limb pruning instead. Both Ponderosa pines & Western Larch are known to be fire-resistant, w/ thick bark & high crowns & ~~no~~ no trees $\geq 21"$ dbh should be cut, as the Region 6 amendment to make the 21" dbh limit only voluntary has been vacated by Judge Aiken, meaning that the 21" dbh limit is again in place & enforceable. Further, none of these trees marked to cut in 11:33 photos are hazard trees.*

11:41 (2) A 28.4" dbh OG PF marked to cut - further out to the right in the 11:33 group photo

11:45 (2) A 23.3" dbh OG W. Larch marked to cut, 3rd from right in group portrait of 11:33

(3) A 21.6" dbh OG Ponderosa pine (5th from right or 6th from left) marked to cut

④ Trees need to be marked from 4' 6" high and from the uphill side of the tree & not from means on top of their duff piles at the base. These trees being marked to cut violates the Forest Plan Eastside Screens 21" dbh cutting limit standard & the RHCA buffer tape may have shown them to 11:56 & 11:57. The middle W. Larch marked to cut (5th from left in 11:33 group photo) has less dbh is actually 21.1" dbh when measured correctly. Photos also show this tree is #46 & w/a "46" painted on the base & orange flagging marked #46.

12:02 (2) A 23.6" dbh OG Ponderosa pine marked to cut (1st from left in group photo of 11:33

12:09-12:10 is the whole group of Ponderosa pines & Western Larch of 11:33, with 5 of them over 21" dbh (or if = 21" dbh) and should not be felled or logged - all of them showing the close proximity of these trees to Trout Creek by willows in the background right by in the creek - so in the RHCA buffer.

- Commercial logging above a creek (as w/ Trout Creek) can dry out the RHCA & decrease moisture retention in the RHCA.
S/W of Trout Creek & rd 1100 - either sale unit 18 or 19, is moist mixed conifer w/ WL & fir & moist P&G. Drop it.
Field surveyed only North above Trout Creek & a logging road off rd. 1100 because S/W of the Trout Creek was
There are no RHCA buffers shown on the revised sale map I received. Not marked & should be

Recommendations

for sale unit: DROP or NOT only.

There's no need to log younger mature, mature, or old growth Ponderosa pine above Trout Creek. More mature P. pines should be left. (D)

Subjective evaluation of area: As with the group of trees (including 5 > 21" dbh) marked to cut, sale unit 18 & the E/NE end of sale unit violate INT/FISH/PAC/FISH Forest Plan RHCA "no logging" buffers by defaulting the sale unit boundaries to old logging roads within the RHCA buffers for Trout

Roadless area ☐ Never logged ☐ Plantation ☐ Many old growth logs and snags Creek

☒ Old growth/mature forest: a band of OG Ponderosa pines within the Trout Creek RHCA

Average tree size in "dbh": variable. NOT to pre-size contribution somewhat, but not the M-OGPs.

Examples of large tree diameter: 32.8" PP, 27.8" PP, 27.3" PP, 29.3" PP

of old growth trees per acre: No count done due to lack of OG snags & logs & just a thin band of OG line.

☒ Previously logged approx. age of trees: Notably, the OG PPs in the Trout Creek RHCA were spared.

Describe marking to cut: current orange marking to save.

Former logging sign (skid trails, stumps, lack of regen., dense overstocked spindly thickets), describe: old logging road below the sale unit (a adjacent) is within the RHCA & so would be the sale unit.

Mixed conifer, specify species and number in descending order of prevalence: ☒ Ponderosa Pine or at least the lower slope.

☒ Juniper ☐ Doug Fir ☒ Western Larch ☐ Grand Fir ☐ Lodgepole Pine ☐ Engelman

Spruce ☐ Subalpine Fir ☐ Yew ☐ Mt. Mahogany ☐ Aspen ☐ Willow ☐ Alder

☐ Shasta Red Fir ☐ Sugar Pine ☐ White Pine ☐ Incense Cedar ☐ other:

Tree seedlings (species, quantity): mostly PP, some WL

Quality and type of canopy closure, %: mostly fairly open & w/ openings - patchy

Historically natural mixed-conifer site: old growth mixed-conifer, fire scars, north slope, moist area, high elevation, describe: Looks like historic PP/WL dominance.

% of defoliation - species and age of trees affected: Mostly green

Species evident using area for habitat/forage (scat, tracks, sightings, calls, foraging/nesting, roosts, dens, burrows, beds, hives, etc.): Robins, Wood Pewee, a shelter space big enough for martin under an old growth P. pine marked to save next to the logging rd. N. of Trout Creek not far from the intersection w/ rd. 1100; an elk deer trail, elk tracks at fording place of Trout Creek.

Riparian area in or adjacent to area/unit(s) (springs, seeps, drainage headwaters, seasonal runoffs, creeks, rivers, lakes, ponds) describe: Trout Creek - a major perennial creek w/ good flow, Calverts under rd 100, fairly consistent hardwood cover, w/ water skippers, prods, small waterfalls (see e.g. Trinch photos of Trout Creek before this sale unit), w/ meandering channel & seasonally moist floodplains but constrained by old logging roads.

Riparian buffers? Adjacent steep slopes? Trout Creek should have a 150-300 ft RHCA buffer on each side, depending on

Unusual plants? Blue-eyed grass by Trout Creek

Plant community types: Snowberry, Elk sedge, Bitterbrush, fish presence & use.

Soil type, quality, compaction level(s): light tan ashy top soil

Typical plants: Oregon Sunshine?, Wild Rose, Wax Currant, Graceful (Pingufoi),

Rosy phloxes, wild Iris, wild Strawberry, Monument plant, OR checker mallow root

Pleabane sp. - lavender petals, yellow centers, small, w/ hairy simple leaves & stems - Aster sp.?

Thimbleleaf lupine, Oregon grape, Lemon weed,

Steepness of slope/aspect of slope (direction it faces): mild to moderate

Landslide risk, describe: N/A

Density of roads (per sq. mi):

Effects of livestock grazing: compos, cattle seen in the Trout Creek RHEA near sale unit 17

Evidence of Animal Damage Control activities: None seen

Evidence of bait stations for hunting, hunters' camps: a hunters camp w/ campfire ring & deer/elk rack on the other (So.) side of Trout Creek - see photos

Mining ☐ Herbicide spraying ☐ Gopher trappings/poison ☐ Other: ☐

Exotic weeds seen: None seen / campsite by Trout Creek 14:10-11 (6 ATVs plus one not photographed)

Recreational use: Lots of ATV recreation along rd 1100 - see photos of ATVs passing my truck

Describe sale unit overall: y-yln-m-06 Ponderosa pines above an old logging road on rd 1100 by Trout Creek (N of Trout Creek) - a narrow sale unit w/m-06 PP's marked orange to save. The band of 06 PP was left probably because it's in the Trout Creek RHEA buffer. Creek

Surrounding area: ☒ contiguous forest ☒ high-graded forest ☐ never logged area ☐ canyon ☐ roadless area(s) ☐ wildlife corridor ☒ meadow ☐ grassland ☐ rocky upland

☐ high desert ☐ seedlings ☐ pine plantation ☐ clear cut ☐ other cut:

☐ public land, agency ☒ private land, ownership 4 SE several miles up rd 1100

☒ riparian (specify): Trout Creek adjacent to southeast sale
area of human habitation?

Species seen adjacent to sale unit:

Photo guidelines: unusual plants/animals, wildlife, old growth canopy-dependent species evidence, nest holes, foraging, burrows, canopy in green sales, riparian areas without buffers, relative severity of burn if fire salvage sale, old growth grove, cattle damage, cumulative impacts of former logging, healthy mixed-conifer, etc.. Minimize number of photos. Draw map of unit & show differences in different areas e.g. Location of old growth, riparian areas, significant wildlife sightings, sensitive plant & exotic weed locations. Identify camera used Canon 1318 survey heading

Photo #s & descriptions: 13:18 adjacent Trout Creek conditions 13:20 - Graceful Cinquefoil flowers

13:21 - 13:22 views of the sale unit 18 above (N of) Trout Creek, w/ lower slope likely in the Trout Creek RHEA 13:22 - proximity of sale unit to Trout Creek RHEA 13:23 - Oregon Sunshiner flowers

*13:28 good photos of a small blue butterfly in adjacent Trout Creek floodplain w/ blue fluffy body, no markings (black edges or spots) 13:30 (2) adjacent Trout Creek 13:30 Blue-eyed grass in

13:31 - OR Checkermallow root flower 13:32 or 13:34 - Aster or Fleabane species - see unusual

13:34 - proximity of sale unit 18 to Trout Creek 13:38 - a shelter under an 06 PP plants

13:41 - another view of sale unit 18 13:39 - big enough for martin w/ view of

13:42 Trout Creek view 13:43 - a 32.8" dbh 06 PP base of the 06 PP marked orange to save

13:44 OR Checkermallow root w/ dbh tape w/ the burrow space

13:46 - a berm easily navigated by ATVs w/ ATV tracks

13:47 proximity of sale unit 18 (blue flagging & orange markings) to Trout Creek

13:47 - an opening in sale unit 18 13:48 - a deer/elk trail

13:49 - 13:51 ATVs passing my truck on rd 1100 just after crossing Trout Cr. N. and rd 1100

6 ATVs - missed one, 13:53 - dbh tape on a 29.2" dbh 06 Ponderosa pine in sale unit 18 (2)

13:56 Thimbleleaf lupine flowers 13:57 - 13:58 more views of adjacent Trout Creek

14:00 a big 06 WL just outside sale unit 18 (2) 14:02 more views of Trout Creek w/ water fall

14:07 elk/deer trail on other (So.) side of Trout Creek

14:10 - 14:11 a well established campsite w/ fire ring, firewood, & deer/elk rack,

as well as 2 driveways - 1 for ATVs up to rd 1100 - next to Trout Creek in the RHEA off rd 1100

(* hypothetically, or theoretically (or for public relations propaganda))

These stands are not even fully mature yet! The FS is cutting before the average "dbh is even 16".
* These stands were thinned to grow larger trees but now the FS wants to just liquidate the forest.

Recommendations

for sale unit: No CTing!

Just NCT. Already wide open except for some PP seedlings. Leave cover patches in openings.

DATE June 8th, 2024

NTL FOREST Walla-Walla

DISTRICT Whitman

PROJECT Huckleberry DFPZ

UNIT 15

SURVEYOR'S NAME

Subjective evaluation of area: Keep in mind Forest Plan standards for scenic views off Hwy 7 & major roads & Forest Plan goals of increasing & retaining old growth. If left alone or just NCTed, these P. pines would grow into open large trees & old growth again. The Forest Service

Roadless area ☐ Never logged ☒ Plantation ☐ Many old growth logs and snags needs to give

Old growth/mature forest: mostly younger mature PPs back

Average tree size in "dbh": about 4.5" dbh with any density smaller than that. to the

Examples of large tree diameter: 30.8" PP Forest,

of old growth trees per acre: Not enough live OG trees or OG snags & logs for an OG count, not

☒ Previously logged approx. age of trees High graded, CTed, NCTed in past timber sale extra

Describe marking to cut: current marking is orange to save. until

Former logging sign (skid trails, stumps, lack of regen., dense overstocked spindly thickets), describe: most

☐ Mixed conifer, specify species and number in descending order of prevalence: ☒ Ponderosa Pine Forest

☐ Juniper ☐ Doug Fir ☐ Western Larch ☐ Grand Fir ☐ Lodgepole Pine ☐ Engelman are

☐ Spruce ☐ Subalpine Fir ☐ Yew ☐ Mt. Mahogany ☐ Aspen ☐ Willow ☐ Alder gone!

☐ Shasta Red Fir ☐ Sugar Pine ☐ White Pine ☐ Incense Cedar ☐ other: _____

Tree seedlings (species, quantity): _____

Quality and type of canopy closure, %: _____

☐ Historically natural mixed-conifer site: old growth mixed-conifer, fire scars, north slope, moist area, high elevation, describe: probably historically Ponderosa pine dominant

% of defoliation — species and age of trees affected: _____

mostly full green crowns

Species evident using area for habitat/forage (scat, tracks, sightings, calls, foraging/nesting, roosts, dens, burrows, beds, hives, etc.): elk scat, a Cassin's Finch heard, Mt. Chickadee heard, Juncos,

Riparian area in or adjacent to area/unit(s) (springs, seeps, drainage headwaters, seasonal runoffs, creeks, rivers, lakes, ponds) describe: None seen.

Riparian buffers? Adjacent steep slopes? _____

Unusual plants? Inky Cap mushroom 17:25 26 on cowpie

Plant community types: Bitterbrush, Sagebrush, Elk sedge, Pinegrass, Snowberry

Soil type, quality, compaction level(s): light tan ash, top soil on clay

Typical plants: Thinleaf lupine, Birchleaf Spirea, Purogates, Penstemon sp., Arrow, Wax currant, Ricegrass sp., wild Hyacinth, wild Rose, Gracful Cinqufoil, OR grapes, wild strawberry, Birchleaf Spirea, Hawkwood, Green Rabbitbrush, Monument plant

wild Iris, a shooting star!
OR Checker mallow root,

Steepness of slope/aspect of slope (direction it faces): variable, very mild slopes

Landslide risk, describe: N/A

Density of roads (per sq. mi):

Effects of livestock grazing: cow pies

Evidence of Animal Damage Control activities:

Evidence of bait stations for hunting, hunters' camps: a hunters' camp w/ deer/elk rack & fire ring 17:18

Mining ☐ Herbicide spraying ☐ Gopher trappings/poison ☐ Other: ☐

Exotic weeds seen: None seen

Recreational use: ATVs, camping, & hunting in general area

Describe sale unit overall: This PP plantation feels sterile & depressing but it is growing healthy Ponderosa pines that could become old growth & diverse again.

Surrounding area: ☒ contiguous forest ☒ high-graded forest ☐ never logged area ☐ canyon ☐ roadless area(s) ☐ wildlife corridor ☐ meadow ☐ grassland ☐ rocky upland ☐ high desert ☐ seedlings ☐ pine plantation ☐ clear cut ☐ other cut: prescribed burn.

☒ public land, agency FS ☒ private land, ownership miles to SE & to NW

riparian (specify):

area of human habitation None

Species seen adjacent to sale unit:

Photo guidelines: unusual plants/animals, wildlife, old growth canopy-dependent species evidence, nest holes, foraging, burrows, canopy in green sales, riparian areas without buffers, relative severity of burn if fire salvage sale, old growth grove, cattle damage, cumulative impacts of former logging, healthy mixed-conifer, etc.. Minimize number of photos. Draw map of unit & show differences in different areas e.g. Location of old growth, riparian areas, significant wildlife sightings, sensitive plant & exotic weed locations. Identify camera used. none 17:02 boundary marker corner for SE corner off rd. 1100

Photo #s & descriptions: 17:03 a view in showing only NET density 17:15 survey heading
17:18(2) deer rack & fire ring in sale unit 15 17:21(2) already died & high graded - if left alone,
17:27 orange bark mature P. pines in [these trees could grow into open old growth PP,
open stands, but most large old Ponderosa pines were removed] as it used to be.
17:32 - The only real density - NET size 17:33 orange bark mPP grove that could grow into
17:36 PP seedling density 17:53 - a 30.8" dbh old growth Ponderosa pine w/ full green crown,
marked to save the biggest tree I found.

Sale unit #1 is nothing more than a "business as usual" timber sale of profitable, straight, high-crowned Ponderosa pine that are very fire resistant in wide open stands - already CTR & NETED. These healthy tall, high-crowned fire resistant pines would be cut for the timber industry and to prevent the trees from reaching 21" dbh protection, not really for fire risk reduction at all. It makes no sense to log

Recommendations for sale unit: ~~Re-mark all trees~~

Unit photos: ~~≥21" dbh marked to cut to be saved by the roads!!~~

ROP* ~~Re-sale unit 3: NCT only!~~

~~No CTing! No CTing is the only~~

Subjective evaluation of area: ~~excess density or fire risk. Leave patches of seedlings/saplings in openings.~~

DATE June 9th, 2024 This for a DFPZ, NTL FOREST Wallawa-Whitman, DISTRICT Whitman, PROJECT Huckleberry DFPZ, UNIT 3, SURVEYOR'S NAME ~~_____~~ already a finished DFPZ.

Roadless area ☐ Never logged ☐ Plantation ☐ Many old growth logs and snags
Old growth/mature forest: lacking OG snags & logs & not many live OG trees left
Average tree size in "dbh":
Examples of large tree diameter: 23.5" DF, 22.9" DF, 22.5" PP, 24.7" PP, 19.7" WL, 24.3" PP
of old growth trees per acre:

☒ Previously logged approx. age of trees NCT & CT stumps, 10:03 - stumps from NCTing/CTing - PP, DF, WL

Describe marking to cut: current: orange marking to save

Former logging sign (skid trails, stumps, lack of regen., dense overstocked spindly thickets), describe:

OG stumps - OG PP 10:08, OG DF stump - 10:11, OG WL stump 10:53

☒ Mixed conifer, specify species and number in descending order of prevalence: ☒ Ponderosa Pine

Juniper ☒ Doug Fir ☒ Western Larch ☒ Grand Fir ☐ Lodgepole Pine ☐ Engelman

Spruce ☐ Subalpine Fir ☐ Yew ☐ Mt. Mahogany ☐ Aspen ☐ Willow ☐ Alder

Shasta Red Fir ☐ Sugar Pine ☐ White Pine ☐ Incense Cedar ☐ other:

Tree seedlings (species, quantity): PP, DF,

Quality and type of canopy closure, %:

☒ Historically natural mixed-conifer site: old growth mixed-conifer, fire scars, north slope, moist area, high elevation, describe: NE/E slope, OG DF & WL stumps, some OG DF

% of defoliation - species and age of trees affected:

Species evident using area for habitat/forage (scat, tracks, sightings, calls, foraging/nesting, roosts, dens, burrows, beds, hives, etc.): Ruby-crowned Kinglet heard, mosquitoes,

fresh woodpecker foraging in a small top, elk scat (10:36)

Redbreasted nuthatch heard, elk/deer trail - (10:48) - same trail w/ elk scat (10:49)

Riparian area in or adjacent to area/unit(s) (springs, seeps, drainage headwaters, seasonal runoffs, creeks, rivers, lakes, ponds) describe: Huckleberry creek below slope of unit 3 & across rd. 1090:

Riparian buffers? Adjacent steep slopes?

Unusual plants?

Plant community types: Elk sedge, Pinegrass, Snowberry, Grouse huckleberry & Big leaf huckleberry (10:57)

Soil type, quality, compaction level(s): light tan ash (10:16)

Typical plants: Ceanothus, clover, Knackinick, Birchleaf Spirea, wildstrawberry,

Thrinleaf lupine, Hawkweed, yarrow, Pussies, Sticky Craquelack,

Wax currant, Azoseris sp., Arnica, Many Bluebells, Paintbrush, Dogbane, Monument plant,

High graded:

(10:17)

Grassland Craquelack

Steepness of slope/aspect of slope (direction it faces): ^{10:16} 19° E/SE at mid slope, just below Hwy 7, middle of sale unit

Landslide risk, describe:

Density of roads (per sq. mi):

Effects of livestock grazing:

Evidence of Animal Damage Control activities:

Evidence of bait stations for hunting, hunters' camps:

Mining _____ Herbicide spraying _____ Gopher trappings/poison _____ Other: _____

Exotic weeds seen:

Recreational use: This sale unit is part of scenic views from Hwy 7 & easily accessible from rd 1090

Describe sale unit overall:

Surrounding area: ☒ contiguous forest ☒ high-graded forest _____ never logged area _____ canyon
_____ roadless area(s) _____ wildlife corridor _____ meadow _____ grassland _____ rocky upland
_____ high desert _____ seedlings ☒ pine plantation _____ clear cut _____ other cut: _____
☒ public land, agency FS _____ ☒ private land, ownership multiple miles SE
☒ riparian (specify): Huckleberry Creek at south end of unit 3
_____ area of human habitation

Species seen adjacent to sale unit:

Photo guidelines: unusual plants/animals, wildlife, old growth canopy-dependent species evidence, nest holes, foraging, burrows, canopy in green sales, riparian areas without buffers, relative severity of burn if fire salvage sale, old growth grove, cattle damage, cumulative impacts of former logging, healthy mixed-conifer, etc.. Minimize number of photos. Draw map of unit & show differences in different areas e.g. Location of old growth, riparian areas, significant wildlife sightings, sensitive plant & exotic weed locations. Identify camera used

Photo #s & descriptions: Canon 39:14-map location 9:14-9:15 very open all trees marked to save, as it makes no sense to log this for fire risk or "fuel" reduction
9:19 Survey heading 9:22-9:23-a 24.4" dbh pine OG Ponderosa pine w/no hazard tree defects next to rd 1090, marked to cut - w/dbh tape, high line crown, adjacent "closed" rd w/ berm off rd
9:26-9:29-a 29.9" old growth Ponderosa pine marked to cut by rd 1090 with dbh tape, 1090 me for scale with this tree, and the line healthy crown - right before bend in rd 1090 just past the "closed" road on the left near highway 7 - on the left side of rd. 1090
9:57 & 9:58 beautiful young mature/mature, & old growth Ponderosa pine / western larch forest that would become really nice old growth if left alone - only fire risk is dense patches of NET size seedlings & saplings
10:10 - already very open WLD, PP from past CTing
10:18 more y/m - mature DF near top of hill by Hwy 7
10:22 - a rare OG PP snag 10:23-24 proximity of sale unit to Hwy 7 10:25 - a m fir snag - Hazy DF
10:23 - 2 m-OG fire scarred stumps - after a fire - likely W. larch
10:42 - still only NET seedling/sapling density near Hwy 7