GHCC GREATER HELLS CANYON COUNCIL

June 24, 2024

Whitney Tayer, NEPA Planner
Cody Taylor, Fuels Planner/Project Lead
Stephaney Kerley, District Ranger
Wallowa-Whitman Supervisors Office
1550 Dewey Ave., Suite A
Baker City OR 97814

Submitted electronically at: https://cara.fs2c.usda.gov/Public//CommentInput?Project=63523

RE: Huckleberry Defensible Fuel Profile Zone (DFPZ) Project

Dear Whitney, Cody, and Stephaney,

I am writing on behalf of the Greater Hells Canyon Council (GHCC) regarding the Huckleberry 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 very much appreciate the opportunity to provide these comments on the project.

We appreciate the re-scoping of this project as we did not receive notification about the project previously. Additionally, we were not notified about a public meeting about the project as well as a public meeting about the West Wall project in May. We discussed this with Environmental Coordinator Brianna Carollo and NEPA Planner Whitney Tayer. We appreciate their efforts to resolve the situation. We did receive the invitation to the July 9 West Wall project field trip from Brianna on June 18. We very much would like to be informed about all such opportunities. Please let us know if we can be of assistance in sorting this out. Thank you.

Regarding information about the Huckleberry DFPZ project, the Whitman Ranger District staff has been very responsive and informative. We very much appreciate their efforts. GHCC Senior Advisor Brian Kelly reached out to Whitney Tayer, NEPA Planner and discussed the project by phone with Whitney and Cody Taylor, Fuels Planner/Project Lead. Silviculturist Joe Sciarrino followed up, and although we missed each other by phone,

Whitney relayed silviculture information by email. We very much appreciate their professionalism.

The Project Area

The project area lies in Baker County, OR, on the Wallowa-Whitman National Forest, Whitman Ranger District. It is located west of Baker City and east of Whitney. Access is by National Forest System Roads 11, 1075, 1080, 1090, and State Highway 667. The proposed treatments are within and directly adjacent to the Sumpter/McCully Forks 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.

- The project area comprises four Management Areas: Timber Emphasis (MA1), Timber Production Winter Range (MA1W), Summer Range (MA3), and 25 acres of Old Growth Preserve (MA15).
- Commercial logging (commercial thinning) is proposed for a total of 2,276 acres. Of this total, ground based logging (commercial thinning) is proposed for 1,926 acres. Cable assisted logging (commercial thinning) is proposed for 350 acres on steeper forest areas.
- Non-commercial thinning (not connected to logging) is proposed for 689 acres. Machine piling is proposed for 500 of these acres and hand piling for 189 acres.
- Total thinning acreage is 2,965 acres.
- Slash piles would be created by hand piling and machine piling. Prescribed fire would occur through burning of piles and broadcast burning.
- Prescribed fire would be on a maintenance burn schedule of approximately every 10 to 15 years after first burn entry. DFPZs that cannot be maintained by prescribed fire would be maintained through manual or mechanical methods.
- Roads –
    - Roads would be managed to reduce future maintenance costs and to improve public safety by removing trees growing into the road prism.
    - Within 10 feet either side on the road prism all trees would be removed. Trees large enough to be merchantable would be logged and removed. Trees less than merchantability would be felled, piled, and burned. This would apply to all roads used for logging. In addition, blind corners would have site distances improved by removing trees in this manner.

    - An estimated 11 segments of new temporary roads would be created for a total of 2.4 miles. Temporary roads would be closed and restored after logging activities have been completed.
- Riparian Habitat Conservation Areas-
    - Trees would be directionally felled within 50 feet towards streams to meet the objective of 20 pieces per mile larger than 12 inches at 35 feet. This would restore wood levels within Clear Creek, Trout Creek and tributaries to meet riparian management objective levels.

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 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.

The purpose and need for the project would 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 modify fire behavior and provide a safe place for firefighters to initiate fire suppression activities.

Goals are identified to develop safe evacuation routes along Highway 7 and Skyline Forest Road 11 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 manage the fire's distribution and protect values at risk by compartmentalization within 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 Sumpter McCully Forks 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

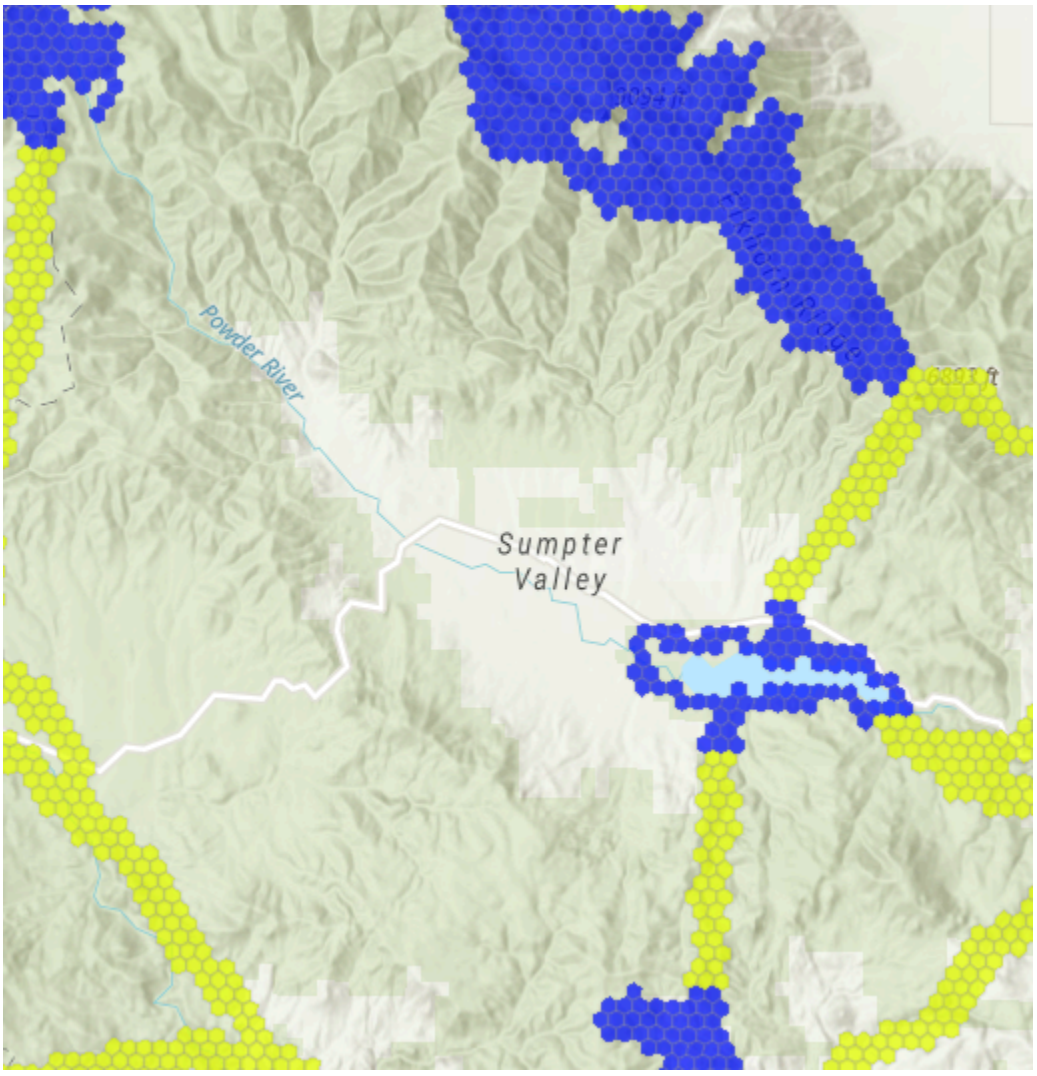
One of the four primary factors identified in the Cohesive Wildfire Strategy is creating fire-adapted communities. This aspect of the strategy describes an opportunity to engage communities and work with them to become more resistant to wildfire threats and provide education and prevention messages targeted 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 this 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 scoping letter is silent about fish and wildlife habitat and habitat connectivity. It is likely that the project has proposed units that overlap with the Oregon Department of Fish and Wildlife's Priority Wildlife Connectivity dataset. Specifically, we are concerned that 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, the North Fork John Day Wilderness, Inventoried Roadless Areas and other unroaded areas, allowing connectivity to important lower elevation habitats.



A very similar concept was previously developed in a part of the Whitman Ranger District to the east of the Huckleberry DFPZ project area (on the former Pine Ranger District). 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 the southern 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 and ODFW as the Huckleberry 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.

- The silvicultural information we received by email states, "Retain all trees 21" inches DBH and greater and those meeting the old definitions (Van Pelt, 2008)." We are very grateful that these protections for old and large trees are to be included for this project. The scoping letter is silent about these protections, so we are very appreciative to receive this information. Thank you.
- We notice that the description of road maintenance states that "Within 10 feet either side of the road prism all trees would be removed." Please clarify that trees over 21"

dbh and/or meeting the old definition would be retained. These trees can be pruned to meet visibility standards by removing their lower limbs.

- Unfortunately, we've experienced large and old trees being cut down in logging units when they meet the criteria of "danger trees" in the vicinity of mechanized logging equipment. Rather than cutting these trees down, we recommend restricting the operation of logging equipment at a safe distance away from these trees. One example are large grand fir trees with cavities caused by heart rot decay. These are important for wildlife habitat and recruitment of large snags and down logs. All large trees in logging units are ecologically valuable and should be retained. Appropriate and necessary fuel reduction can be safely accomplished through hand thinning following appropriate safety standards while retaining important large wildlife trees.

Old Forests

The silvicultural information we received by email describes the project area forest as "predominantly in multi-story non-old forest with 15 acres in multistory old forest which will be hand-thinned in accordance with the Forest Plan". We appreciate this approach. Are these 15 acres within the 25 acres of Old Growth Preserve (MA15) within the project area? We recommend any potential treatments within either old growth structural forests or MA15 Old Growth Preserve Management Areas be hand treatments.

Roads

An estimate of 11 segments of new temporary roads are proposed for a total of 2.4 miles.

Please specify how many of these temporary roads are proposed to be created on existing templates. Temporary roads constructed through previously undisturbed forest soils create significant impacts that are not remedied by ripping or closure after their use.

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 350 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 restricted to smaller trees in limited strategic areas. Please do not include logging in moist forests.

The silvicultural information we received by email describes that cool/moist forests in the project area are limited to 15 acres. We encourage the Forest Service to limit any treatments in these cool/moist forests to non-commercial hand thinning.

Treatments in Riparian Habitat Conservation Areas (RHCAs)

The project document describes directionally falling trees within RHCAs "within 50 feet towards streams"and is otherwise silent regarding any other potential treatments in RHCAs. We support restoring wood levels to meet riparian management objectives. We encourage the Forest Service to analyze a full range of additional potential aquatic restoration activities in the riparian areas to benefit fish habitat and hydrology. We advocate against commercial thinning/logging in RHCAs. Please analyze how any potential treatments in RHCAs may increase cattle access to riparian areas and potentially result in negative impacts to water

quality and fish and wildlife habitat. Please address how to minimize these potential negative impacts.

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

Private industrial forests have been heavily logged adjacent to the Wallowa-Whitman National Forest. 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. At a minimum, please thoroughly analyze the cumulative effects of the heavily logged private lands in combination with the proposed commercial logging on this 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 necessary considerations for public safety. We are grateful to see that prescribed fire is included in the project proposal, that broadcast fire is included in the design, and that prescribed fire is included in the maintenance plan for the DFPZs.

Limited Information About the Proposed Treatments

We appreciate that the public notice/scoping letter 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, fish and wildlife considerations, and more. As we described above, GHCC Senior Advisor Brian Kelly reached out to Whitney Tayer, NEPA Planner and discussed the project by phone with Whitney and Cody Taylor, Fuels Planner/Project Lead. Silviculturist Joe Sciarrino followed up for additional information. We very much appreciate their efforts. The information provided has been very helpful to us in providing these comments.

We encourage the Forest Service to provide more information and detail in the scoping letters and public notices for upcoming projects. It appears that more detailed information is available--why not include it in the scoping document? It allows the public to be able to provide more informed comments on the project.

Additionally, we encourage the Forest Service to prepare an Environmental Assessment (EA) for this project and similar projects. Commercial logging of 2,276 acres and creating 2.4 miles of temporary roads creates the potential for impacts beyond the capability for analysis with a Categorical Exclusion. Informed decision-making is an important part of a NEPA analysis. Our comments on this project describe numerous environmental effects that should be analyzed. An EA would more effectively assure that our National Forest is receiving the best analysis and management possible.

In Summary

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

- Protect wildlife habitat and connectivity.
- 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 old growth forests.
- Do not log in RHCAs.
- Use this opportunity to provide aquatic restoration 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 including landscape/ broadcast prescribed burning*.

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

Sincerely,

Brian Kelly
Brian Kelly, Senior Advisor
Greater Hells Canyon Council
PO Box 607
Enterprise, OR 97828
brian@hellscanyon.org

Jamie Dawson
Jamie Dawson, Conservation Director
Greater Hells Canyon Council
PO Box 607
Enterprise, OR 97828
jamie@hellscanyon.org