Erin Black, District Ranger  
Mount Adams Ranger District  
2455 Highway 141  
Trout Lake, WA 98605

Comments submitted electronically at https://www.fs.usda.gov/project/?project=63961

October 26, 2024

Re: Little White Salmon Forest Resiliency and Fire Risk Mitigation Project Draft Environmental Assessment

Dear District Ranger Black,

I have reviewed the proposed Little White Salmon Forest Resiliency and Fire Risk Mitigation Project Draft Environmental Assessment (EA) particularly as it impacts the Monte Cristo-Monte Carlo Special Interest Area and the Monte Cristo Research Natural Area.

The Monte Cristo Range is unique in straddling the crest of the Cascades Mountain Range that bisects Washington. Its transitional location between the dry east side and the moist west side of the Cascades has produced special botanical habitats, high plant biodiversity and landscape complexity which led to the designation in the 1990 Forest Plan of the Monte Cristo-Monte Carlo Special Interest Area and the 1998 designation of the Monte Cristo Research Natural Area. The wildflower displays in June are equal to or better than Dog Mountain in the Columbia River Gorge National Scenic Area but without the crowds.

I have botanized numerous times on the Monte Cristo Trail, the Monte Carlo Trail and the adjacent Washington Department of Natural Resources Monte Cristo Natural Area Preserve. Earlier this year, while hiking the Monte Cristo Trail, I noticed the presence of many blooming *Boechera atrorubens* (dark-red-flowered rockcress) which is on the Washington Natural Heritage Program’s list of *Washington Vascular Plant Species of Conservation Concern 2024* with a State Status as Endangered. I photographed some of the plants and had my identification confirmed by botanical experts so I prepared a Field Data Sheet and submitted a report to the Washington Rare Plant Conservation and Care Program at the University of Washington, for which I am a volunteer, and I also reported the sighting to Trey Scott, the recently arrived South Zone Botanist. Due to a data entry backlog at the Washington Natural Heritage Program, it could take up to eight years for the report to be logged into the state database so I wanted Trey to know about it for this project. The presence of *Boechera atrorubens* should be added to the values of the Monte Cristo-Monte Carlo Special Interest Area.

My review of the draft EA and supporting specialist reports shows me that I have more on-the-ground knowledge of Monte Cristo-Monte Carlo than the resource specialists. The Scenic Resource Effects Report reveals that “Due to project timing, the preparing specialist was not able to refine key observation points, field verify the existing conditions, analysis, or conclusions. All analysis and conclusions herein are the result of a GIS mapping and desk exercise. As a result, assumptions of existing visual quality and potential impacts were made that may be inaccurate for some portions of the project area.” Meanwhile, the Botany Effects Report does not mention the Special Interest Area at all so it is unlikely that the author made any field visits to Monte Cristo or Monte Carlo.

**Forest Plan Compliance and Proposed Amendment**

At my request, the project lead, Jessica Hudec, prepared a one-page map for me that showed the proposed treatments within and adjacent to the Monte Cristo-Monte Carlo Special Interest Area along with the locations of the Special Interest Area boundaries, the boundaries of the Research Natural Area and the locations of trails.

When I looked up the proposed treatments for units that overlap the Special Interest Area, I saw that units 303949, 303964, 303965 and 303972 all are over 80 years old and three of the four are a high elevation around 4,000 feet. The treatments propose removing 40 to 60 percent of the canopy cover of these mature or perhaps even old-growth forests.

These proposed treatments are at odds with the prescriptions for Special Interest Area management in the Gifford Pinchot National Forest Land and Resource Management Plan (Forest Plan). The Forest Plan states: “Vegetation may range from natural openings through stands of mature and old-growth timber. Most features included in this MAC will remain in a substantially undisturbed condition.” [Forest Plan, pps. 90-91]

I think that any proposed Forest Plan Amendment to deviate from the Forest Plan’s Visual Quality Objective of Retention needs to address a longer period than three years. “Retention” is defined in the Forest Plan as: “Human activities are not evident to the casual forest visitor. These are landscapes with high scenic integrity.” Removing 40 to 60 percent of the canopy cover will be a noticeable visual condition for a much longer time than three years, particularly with the associated impacts of new temporary roads, skid roads, yarding corridors, tethered logging corridors, equipment staging areas, fuels reduction burn scars, and other ground disturbance. Greater visibility into and through the forest will result from the removal of brush so evidence of tree removal as basic as stumps will be visible for longer than three years; otherwise, fire risk reduction will not have been achieved.

The proposed project also deviates from the Forest Plan’s Timber direction that “There will be no schedule timber harvest.” [Forest Plan, p. 92/Draft EA, p. 21) When the Forest Plan says that “Trees should be removed when they are a hazard to life or property” I doubt that the authors were envisioning this proposed scale of tree removal. Based on the remainder of the language in that paragraph, I think the context means individual hazard trees that might endanger visitors at viewpoint or the features for which the Special Interest Area was established, not 40-60 percent canopy removal over several hundred acres.

The draft EA says on page 19 that in Administratively Withdrawn Areas, “Timber harvest may be allowed in some areas if determined to be an appropriate management tool to meet the purposes and desired conditions of administratively withdrawn areas.” But the EA never demonstrates how timber harvest meets the purposes and desired conditions of the Monte Cristo-Monte Carlo Special Interest Area. This document needs to demonstrate how the proposed removal of 40 to 60 percent of the canopy cover in at least five units containing 400 acres will enhance the botanical features of the Special Interest Area and how the benefits to the Special Interest Area will outweight the impacts.

**Botanical Impacts**

The proposed fire risk mitigation actions within the designated Monte Cristo-Monte Carlo Special Interest Area pose the hazard of impacts to the botanical features for which it was designated. These features include dry meadows and rock gardens, and mature and old-growth forests with diverse tree species. Just because the plant species are not listed by federal or state agencies as rare or endangered does not mean that they don’t require consideration in management, particularly since the particular assemblage at Monte Cristo-Monte Carlo was the reason for the Special Interest Area designation.

Since the botanical features that made Monte Cristo-Monte Carlo worthy of Special Interest Area designation in the Forest Plan did not receive any discussion in either the Draft EA or the Botany Effects Report, the Forest Service cannot make an informed decision about potential botanical impacts from the proposed project.

Botanical impacts include:

* Habitat degradation from increased sunlight and solar penetration, increased drying, more wind and humidity alterations, including faster snow loss in the spring, would alter the micro-climates of Monte Cristo-Monte Carlo. These micro-climate changes will most impact those west Cascades species that depend on moist conditions to thrive and could alter the mix of plant species present. The proposed thinning would remove larger trees to achieve 40 percent canopy cover which would alter the existing forest stands on Monte Cristo-Monte Carlo.
* Plant injury or death from prescribed fire, hazardous fuels reductions, and fire-line construction and burn piles.
* Plant injury or death from trampling and equipment use during logging, including tree felling and yarding.
* Plant injury or death from temporary road construction, and skid trail, yarding corridor and tethered logging corridor construction, landings, log decks and equipment staging areas.
* Habitat degradation due to the introduction of non-native invasive plant species brought in on equipment vectors or spread due to soil disturbance. In Appendix 1 of the Botany Specialist Report, the project area is rated as high risk for introduction of invasive species. Invasive species treatments with herbicides would only compound the botanical impacts.

I am particularly concerned about thinning for fire risk in mature forests at the north end of the Monte Cristo Special Interest area. These mature forests are about 100 years old based on what I can see in the 1934 panorama photo taken at the Monte Cristo fire lookout site. Viewed from the Monte Cristo Trail, these forests appear to have already developed some complexity and old-growth characteristics that give them inherent fire resilience.

**Opportunities for Motorized Vehicle Intrusion**

The Monte Cristo and Monte Carlo trails are designated for non-motorized recreation. This has not stopped motorcycle riders from riding on the trails. The evidence is visible on the trail tread, ruts, and torn up tread. On a hike in 2021, I encountered a motorcycle rider on the trail; when I flagged him down and told him he should not be there, he offered the lame excuse that he was looking for a lost friend (whom we could hear riding on Road 1840 down below). Building “temporary roads” that access the trails will simply invite more motorized vehicle intrusions as riders explore new opportunities or look for loops to ride. This particularly an issue in Units 303949, 303964, and 303965. At the Monte Carlo end, motorcycle riders come in from the DNR roads in the Buck Creek drainage and Penny Ridge.

The draft EA proposes that trails may be used as skid trails or temporary roads. That is an open invitation to motorized use since the trail tread would be widened and hardened to handle the weight and size of logging equipment. The mitigation of decommissioning a road into a trail would cause considerable impact to the trailside environment. This proposal is not compatible with the botanical features of the Monte Cristo-Monte Carlo Special Interest Area.

**Life of the Project**

The draft EA presents itself as solving wildfire risk for surrounding communities, but shrubs and trees will return rather quickly, depending on the site. The draft EA (p. 47) says, “[the] potential flame length is reduced immediately after thinning (whole tree yarding) and *begins to increase again 5-10 years post-treatment as surface fuels accumulate* [emphasis added]. Flame lengths may eventually exceed the no-treatment level as accumulated fuel loads are affected by increased winds at the surface, particularly following heavier thinning (see fuels report for additional discussion). Re-entry with maintenance treatments is proposed, as conditions dictate, to keep surface fuel loading and associated flame lengths low.”

That means that the temporary roads are not really temporary since they will need to be reopened every 10 years to reenter the units for wildfire risk reduction through tree and shrub removal. The impacts of this proposed project to the Monte Cristo-Monte Carlo Special Interest Area would become a regular event with the potential to irrevocably alter the botanical values for which the area was designated in the Forest Plan.

**Fire Risk Reduction and Community Protection**

One stated purpose of this project is to “reduce wildfire risk to communities and high value resources and assets.” (Draft EA, p. 1) The Draft EA fails to consider that large wildfires are inevitable and that protecting homes and businesses is the most cost-effective and least ecologically damaging strategy for dealing with climate-induced wildfires.

This Draft EA must avoid the false and simplistic notion that logging the forest provides security to communities and homes. Neighboring communities should be empowered to build resiliency into their built environment by planning for and mitigating wildfire risk. They should not be lulled into a false idea of security by forest thinning and fuels reduction, which are only temporary measures since the vegetation will grow back.

The Draft EA does acknowledge that fuel reductions are transitory, which is why the modeling only goes out to 2040. The regrowth of vegetation quickly negates the influence of thinning and fuels reduction on fuel. Often, thinning and prescribed burning result in more fine fuels like grasses, small trees, and shrubs, which are the primary fuel components of any blaze. If fuels reduction is to have any chance of stopping a wildfire’s advance, it must be repeated every few years –forever.

Recent research shows that all large wildfires are climate and weather-driven events. Severe drought, high temperatures, low humidity, and, most importantly, high winds, result is unstoppable blazes. The 2020 Holiday Farm Fire in Oregon is an excellent example of how ineffective fuels reductions efforts are when there is extreme fire weather. That fire ran across miles of clearcuts and other “fuel reductions” on the Willamette National Forest and private commercial timberlands.

The scientific consensus is that prescribed burning might work for a very short time – only a few years to a decade at best – to slow or stop wildfire burning under low to moderate fire weather conditions; it fails under extreme fire weather. This short-term influence is a crucial point often overlooked in discussions on wildfire risk management. The other issue is the extremely small probability that any wildfire will encounter a fuel reduction when it might be effective. Thus, community-wide preparation for wildfires is necessary.

Further, a review examined 1,500 wildfires to determine how fuel reductions influenced fire severity concluded that fire severity was lower in protected landscapes like wilderness areas and parks even though they presumably had higher fuel loading than areas under active forest management.[[1]](#footnote-2) Thus, the priority focus of this proposed project on thinning and fuels reduction in the Monte Cristo-Monte Carlo Special Interest Area may be unnecessary since they will not significantly affect the outcome of any future fires. Rather, risk mitigation should begin with the homes in vulnerable communities and work outward.

**Proposed Forest Plan Amendment**

I am opposed to the proposed project-specific Forest Plan Amendment to reduce the Visual Quality Objective for the Monte Cristo-Monte Carlo Special Interest Area from Retention to Partial Retention for the duration of the project. Since the resource specialists have not even made a site visit to the Special Interest Area, the Forest Service cannot make an informed decision that this amendment will be adequate. I suspect the visual impacts of the treatments and all the associated fuels reduction activities, such as temporary roads, skid trails, yarding corridor and tethered logging corridors, landings, log decks, fire lines, burn piles and equipment staging areas will be evident longer than three years. This section of the Draft EA is speculative at best and a set of empty promises.

**Conclusion**

The proposed management units in the Monte Cristo-Monte Carlo Special Interest Area should be removed from this project. These include: 303949, 303964, 303965, 303989, 303992, 303998, 304204, 304205 and 304206.

* The draft EA has neither described nor demonstrated how the proposed actions would meet the purposes and desired conditions for which the Special Interest Area was established.
* The draft EA has not addressed the need for a Forest Plan amendment to allow “scheduled timber harvest” in the Special Interest Area.
* The draft EA has failed to identify or mitigate for the impacts to the botanical features that are foundational to the Special Interest Area designation, including the recently identified *Boechera atrorubens*.
* The draft EA has failed to identify or mitigate for the potential for motorcycle intrusion into the Special Interest Area as a result of temporary roads providing more motorized vehicle access opportunities.
* The draft EA has not addressed the impacts or mitigations of repeated management intrusions into the Special Interest Area to maintain the fire risk reduction conditions that are the goal of this proposed project.
* The draft EA has not demonstrated that proposed project-specific Forest Plan amendment will be adequate to protect the qualities for which the Special Interest Area was designated.
* The draft EA has not addressed fire risk mitigation in the adjacent communities as opposed to the inevitable negative consequences of thinning and fuels reduction and temporary road building in the Monte Cristo-Monte Carlo Special Interest Area.

Sincerely,



Susan M. Saul

1. Bradley, Curtis M., Chad T. Hanson and Dominick A. DelaSalla. *Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States?* Ecosphere. Volume 7, October 2016., Article e01492. [↑](#footnote-ref-2)