Oregon
Tina Kotek, Governor

Department of Fish and Wildlife
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Mr. Gabe Wishart
Middle Fork Ranger District
Willamette National Forest
46375 Highway 58,
Westfir, Oregon 97492

RE: Middle Fork Fire Affected Roads Environmental Assessment

Dear Mr. Wishart:

The Oregon Department of Fish and Wildlife (the "department") appreciates the opportunity to provide input on the Willamette National Forest Environmental Assessment (EA) to remove standing dead and injured trees from 139 miles of important access routes throughout areas affected by the Gales, Cedar Creek, and Bedrock fires. Treatments along these roads include falling fire-killed and injured trees on roughly 3,070 acres of land and reducing fuels within 100 feet of treated roads.

It is the policy of the state of Oregon to manage fish and wildlife to prevent serious depletion of indigenous species and to provide the optimum recreational and aesthetic benefits for present and future generations of the citizens of this state (ORS 496.012). In accordance with this mission, the department provides the following comments and recommendations for the record:

General Comments

- As forest fires become more frequent and closures across burned areas increase, access to public lands across Oregon is decreasing. The Willamette National Forest supports an abundance of opportunities for hunters, anglers, hikers, and others who value Oregon's natural resources. The department supports access for emergency responders and the public to National Forest System land and recognizes the need to reduce risks posed by fire-killed and injured trees along important access routes.

- The department recommends that the document provide as much specificity and detail as possible about how the Forest Service will ensure, improve, and promote coordination between agencies and other partners to develop and implement a comprehensive post-fire salvage and vegetation management plan. The issues facing Oregon's forests, fish, and wildlife are varied and complex, and further complicated by uncontrolled wildfire. Addressing these issues will necessitate well-coordinated and cooperative actions. This should include local Department of Fish and Wildlife district staff directly in a collaborative process for input.

Fish & Wildlife

- The department recommends the Forest Service conduct their operations in months that do not interfere with sensitive time periods for wildlife such as the primary nesting season for birds (February-July). The department recommends considering strategic restrictions to motorized vehicle access to reduce erosion impacts and disturbance to elk and deer, especially during late winter and during spring/early summer for calving/fawning.

- The EA references replacing and installing new culverts. The department requires that all culverts that are installed on streams that contain native migratory fish comply with Oregon's fish passage laws (ORS 509.585 – ORS 509.910).

Habitat & Vegetation Management

- The department encourages leaving some burned wood on the landscape, particularly in riparian areas. Standing dead wood supports a variety of terrestrial species and allowing natural succession of burned systems provides for future recruitment of large woody debris that will be beneficial for creating complexity in aquatic habitats.
- The department recommends that trees considered to be a hazard and needing to be felled within 100ft of the Ordinary High Water (OHW) mark of streams be left within the Riparian Management Area (RMA) following felling.
- Proposed fuel treatment includes pile burning. The department encourages the Forest Service to utilize broadcast and jackpot burning whenever possible over piling. These two fuels treatments have the potential to improve the quantity and quality of forage for wildlife, especially big game species (Burning for Big Game, 2018). Additionally, these treatments reduce fuel loads more effectively, further mitigating the potential of future high severity fires
- The department recommends that the document include an invasive species plan for proposed salvage activity areas. Many invasive species proliferate after disturbance. If widespread salvage activities are taking place, the risk of invasive species introduction across the fire footprint will increase. ODFW supports manual, chemical, and biological weed abatement methods. The severe negative impacts non-native, invasive plants can have on ecological communities necessitates the USFS having access to all these abatement methods.
- Whenever possible, the department recommends that assessment of the live/dead status of hardwood trees is deferred until after the normal leaf-out period in the spring for the specific location. The department recommends that the Oregon Department of Forestry (ODF) post-fire tree mortality guidance or similar guidance be used to identify trees that will be classed as dead in the context of hazard tree identification (ODF 2020).

The department recognizes that the overall goal of the proposed salvage logging operation is to increase access and ensure human health and safety for workers, emergency responders, and public recreationalists. While the department is in support of this objective, it believes there is a further and greater opportunity to help shape this disturbed ecosystem for maximum benefit of fish and wildlife.

With climate change increasing the frequency and intensity of fires, it is important to consider taking greater lengths to combat the destruction of important habitat (Westerling, et al. 2014). Fire severity and extent are starting to exceed historical averages, which are causing detrimental impacts to wildlife populations (Ayars, et al. 2023). Removal of dead standing trees can help

reduce fire fuel loads, thus helping to reduce fire severity and extent and thereby reducing impacts to wildlife populations (Peterson, et al. 2015). This EA can be seen as an important part of reducing the severity of future wildfires in the area and positively impacting those wildlife populations.

The department encourages extended efforts be made to promote fire resiliency on a larger area of the landscape, for example using the increased access from salvage logging to introduce more prescribed burns or thinning operations. Any amount of increased fire resilience to counter increasing fire severity will be greatly beneficial to wildlife species in the area. Not only do prescribed burns benefit wildlife by reducing future fire severity, but also promote patches of early seral habitat necessary for species such as deer, elk, and songbirds.

The Oregon Department of Fish and Wildlife is open to entering into a Good Neighbor Authority agreement with the Forest service to collaborate on restoration projects throughout the areas affected by the Gales, Cedar Creek, and Bedrock Fires. These restoration projects could include, but are not limited to, native plant reseeding, prescribed burns, invasive species control, and other patch habitat creation and management activities.

Thank you for the opportunity to provide input on this important project. Please feel free to contact me if you have any questions.

Respectfully,

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Citations

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ODF. 2020. Post-fire tree mortality forest health fact sheet. https://www.oregon.gov/odf/Documents/forestbenefits/post-fire-tree-mortality.pdf

Peterson, W. David; Dodson, K. Erich; Harrod, J. Richy. 2015. Post-fire logging reduces surface woody fuels up to four decades following wildfire. Forest Ecology and Management. Volume 338. ISSN -378-1127.

Westerling, Anthony; Brown, Tim; Schoennagel, Tania; Swetnam, Thomas; Turner, Monica; Veblen, Thomas. 2014. Briefing: Climate and wildfire in western U.S. forests. In: Sample, V. Alaric; Bixler, R. Patrick, eds. Forest conservation and management in the Anthropocene: Conference proceedings. Proceedings. RMRS-P-71. Fort Collins, CO: US Department of Agriculture, Forest Service. Rocky Mountain Research Station. p. 81-102.