OPAL CREEK
ANCIENT FOREST CENTER

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Dear Eslpeth Gustavson,

In response to the 2020 Fire Affected Road System Risk Reduction Supplemental Environmental Assessment, I am submitting this comment as the Facility Director of Opal Creek Ancient Forest Center.

Opal Creek operates a 15-acre commercial inholding at the end of WNF Forest Service Road 2209, in connection to many developed USFS recreation sites and trailheads. Approximately 5.5 miles of FSR 2209 between the WNF Boundary and the Opal Creek Administrative Gate is within this scope of work and classified as a ML-3 road. The remaining 3.2 miles of FS 2209 between the Administrative Gate and our inholding is jointly used as both an administrative road (classified as a ML-2 road) and a public trail. This section was removed from the scope of the original Environmental Assessment on November 15th 2022, as a result of the objection resolution process, and will be analyzed in a separate NEPA review process.

For decades we have held the rights and essential certifications to manage our inholding responsibly and have actively supported safe road conditions, road maintenance and consistent access via both sections of FS 2209. Our team holds the necessary permits, tools, and experience to provide daily inspections and has served as the primary responder to medical emergencies and access issues such as downed trees and rockfall. We have ensured safe ingress and egress for Forest Service personnel, volunteers, and operations, particularly in the wake of the 2020 fire.

With these responsibilities and experiences in mind, we understand this Supplemental EA reports snag deterioration and adaptively expands snag management strategies, by both site conditions (slope percent) and methods (mechanical felling). We urge the USFS to adopt and include additional adaptive management strategies for sensitive and scenic areas in this Supplemental EA that first prioritize retaining standing snags, then second allow for modifying standing snags, before moving to felling strategies. These strategies will allow for the identification and treatment of snags that truly qualify as hazards to public safety, enhance ecological integrity and will result in lower costs throughout treatment areas. Specifically, we advocate for the following:

1. Retention of Large-Diameter Snags with Hazard Mitigation via Topping

- Larger-diameter snags provide essential ecological, aesthetic, and structural benefits, particularly in riparian zones and scenic corridors. The Forest Service's own research highlights that snags over 20 inches DBH persist significantly longer and serve as valuable habitat for wildlife.
- Mitigating hazards through snag topping (e.g., removing the upper third of hazardous snags) would reduce risks highlighted throughout the supplemental risk reduction EA, while preserving key ecological and visual elements in alignment with Visual Quality Objectives (VQOs).
- In ecological sensitive areas that experienced high wind-throw (contributing to the now heavy ground fuels post-fire), and where the felling and leaving of hazardous trees is required, leaving and topping large diameter snags prevent exceeding post-fire fuel thresholds of downed woody debris (DWD).

2. Adaptive Management and Monitoring of Post-Fire Snags

Given the Forest Service's limited budget and reduced capacity for continuous road and forest monitoring, Opal Creek and other similar inholders and partners are uniquely positioned to support collaborative monitoring and adaptive management along FS roads. For example: as an In-holder with direct access to the entirety of FS roads 2207 and 2209, Opal Creek has the capacity to conduct regular inspections of snag conditions and road safety. This collaboration would enable timely development of site and snag-specific management responses, minimizing the need for costly, widespread large-scale treatments that compromise ecological integrity.

- The Forest Service retains standing snags in designated high-priority zones, particularly riparian areas, wildlife corridors, and regions visible from key recreation areas.
- Opal Creek provides regular inspections of the road system and surrounding areas, utilizing our expertise and tools to assess snag stability and road safety.
- Regular consultations between Forest Service staff and Opal Creek ensure adjustments to snag management strategies based on observed conditions, aligning with long-term ecological and safety goals.
- Snag management occurs on a regular, as-needed pace as certain snags truly become hazards.

3. Acknowledge the Integrated Importance of Both Sections of FS 2209

- While the 3.2 mile ML-2 Administrative Use section of FS 2209 between the Opal Creek Trailhead Administrative Gate and our inholding was removed from both the previous EA and this Supplemental EA, and will be reviewed under separate NEPA analysis, the integrated experience of recreational users within the Opal Creek SRA should be a critical part of the broader management strategy. Given the SRA's historic and scenic significance, ecological sensitivity, and complex recreational and commercial use, we recommend that highly conservative snag retention strategies proposed for the 3.2 mile administrative use road/public trail portion be applied consistently across the entire FS2207 and 2209 road corridors within the Opal Creek SRA. This would allow visitors to the SRA to be safe and have an integrated and recreational experience, rather than experiencing dramatic edges of differing treatment areas.
- At a minimum, this Supplemental EA should note that the Administrative Use/Public Trail portion of FS 2209 will be treated under a separate NEPA analysis.

Conclusion

The full length of FS Road 2209 is critical to both recreational access within the Opal Creek SRA and the commercial operations of the Opal Creek Ancient Forest Center. However, the recreational experiences and Visual Quality Objectives for visitors within the SRA are intended to allow guests to see natural landscapes without cut stumps, and roadsides without cleared setbacks areas or piles of felled trees. By adopting adaptive management strategies that support snag retention, collaborative monitoring, and consistent standards across related road systems, the Forest Service can better meet safety goals while supporting ecological and

recreational values. Opal Creek Ancient Forest Center remains committed to working with the Forest Service to achieve these outcomes and to ensuring safe and sustainable access for all stakeholders.

Thank you for considering these comments. I welcome further discussion on these recommendations and look forward to continued collaboration.

Sincerely,

Augustus Gleason
Director of Facilities, Opal Creek Ancient Forest Center

Sources:

Persistence of fire-killed conifer snags in California, USA Persistence of fire-killed conifer snags in California, USA,

Snag Dynamics DecAID in Western Oregon/Washington:
https://apps.fs.usda.gov/r6_decaid/views/snag_dynamics.html