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Organization: Hells Canyon Preservation Council
Title: Restoration Director
Comments: Ten Cent Community Wildfire Protection Project--DEIS Comments

Please accept these comments for the Ten Cent Community Wildfire Protection Project DEIS.

Thank you.

Brian Kelly

Restoration Director

Hells Canyon Preservation Council

Contents of Attached Letter:

December 5, 2016

Via E-mail: comments-pacificnorthwest-umatilla-northfork-johnday@fs.fed.us

Ian Reid, District Ranger

North Fork John Day Ranger District

Umatilla National Forest

PO Box 158

Ukiah, OR 97880

RE: Comments for the Ten Cent Community Wildfire Protection Project

Draft Environmental Impact Statement (DEIS)

Dear Mr. Reid:

I am writing on behalf of Hells Canyon Preservation Council to comment on the Ten Cent Community Wildfire Protection Project. The project proposes to reduce fuels using mechanical logging and mastication treatments as well as prescribed burning. The project is located in the Granite Creek Watershed in the Umatilla National Forest (63%) and the Wallowa-Whitman National Forest (37%). The project planning area is about 37,800 acres and

also includes about 9,500 acres of the North Fork John Day Wilderness. The project area is located in Grant County, Oregon. The DEIS analyzes three action alternatives as well as a no-action alternative.

Hells Canyon Preservation Council (HCPC) is a non-profit conservation organization based in

La Grande, OR with approximately 1000 supporters. HCPC[rsquo]s 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. HCPC actively participates in Forest Service proceedings and decisions concerning the management of public lands within the Umatilla National Forest and is an interested public with regard to timber sales, fuel reduction projects, and other forest management activities within the North Fork John Day Ranger District.

Proposed Action

The Ten Cent project proposes multiple types of treatments to reduce fuels and increase spacing between the crowns of forest trees. Treatments would extend up to 1.5 miles from private land boundaries to create defensible zones. Defensible zones would also be created along roads identified as strategic for fire management and ingress/egress routes. Most mechanical treatments are within [frac14] mile of identified [ldquo]values at risk[rdquo] (cities, private inholdings/ structures, and strategic routes). All mechanical treatments are within 1.5 miles of these values at risk. About 38,000 acres of prescribed burning is proposed including a maximum 9,500 acres in the North Fork John Day Wilderness

Alternative 3

Alternative 3 would minimize prescribed fire treatments and would maximize mechanical treatments. Thinning prescriptions would cut more heavily than in the other Alternatives.

Alternative 4

Alternative 4 includes features that are beneficial to wildlife, their habitats, and habitat connectivity across the project area and potentially beyond. Alternative 4 also emphasize the benefits of prescribed burning and addresses prescribed fire in the Wilderness.

Fuel Reduction Projects

HCPC carefully evaluates projects that propose fuels reduction treatments such as the Ten Cent project against the following criteria:

* Fuels reduction thinning should be applied only in ecologically-appropriate dry ponderosa pine and pine intermixed with Douglas fir plant association group forests. This is the only fire-regime where fire suppression has potentially outlasted the range of the fire return interval and therefore stand structure may be outside of a historical condition. These projects should be ecologically constrained by elevation and by site-based evidence of non-lethal surface fire on a short return interval.
* Protect all trees with old growth characteristics regardless of their diameter or species. Old growth characteristics include thick bark, colored bark, asymmetrical growth, large braches, and dead tops. These old trees will generally be the some of the most fire resilient trees on the landscape.
* Protect all large trees. All trees 21 inches in diameter at breast height (dbh) and larger of all species should be retained. These large trees will generally be the some of the most fire resilient trees on the landscape.
*

Holistic landscape management, with an awareness of effect of fuels reduction activities on wildlife species, non-native species, soil and soil processes, and insect and disease risks.

* 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.
* 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 value conservation. Restoration using fire alone is generally appropriate in these stands.
* Utilize existing roads for removing and hauling wood products. Eliminate unneeded roads. No construction of new temporary roads.
* Protect all Inventoried Roadless Areas and Potential Wilderness Areas as identified in the Blue Mountains Forest Plan Revision process from commercial logging and mechanical activities.
*
Maintain wildlife permeability throughout the project area. Movement to and from large core habitat areas should be consciously planned for. All roadless areas such as inventoried roadless areas, uninventoried roadless areas and any areas with potential wilderness quality should be protected.

Successful forest restoration strategies must take into account the specific ecology of forests as well as the history of land management activities in a particular place (Crist et al. 2009). Inappropriate application of restoration treatments on a landscape may lead to failed restoration efforts (DellaSalla et al. 2003). HCPC encourages the Forest Service to recognize that in our topographically complex part of the world where mixed conifer forests and variable fire regimes dominate, managing for a diversity of disturbance intensities is superior to managing for a homogenous forest where low-severity fire dominates.

Comments

We appreciate that the Forest Service developed Alternative 4 to address prescribed fire in wilderness, wildlife connectivity, and reductions of the amount of mechanical thinning. We also appreciate that Alternative 4 focuses on leaving larger wildlife islands, protecting wildlife connectivity corridors, and [ldquo]feathering[rdquo] treatments away from islands, corridors and private land boundaries.

We support these elements of Alternative 4 that emphasize the benefits of prescribed fire and protect wildlife habitat and connectivity. We encourage the Forest Service to adopt these elements in the Record of Decision.

We also appreciate that the proposed mechanical thinning focuses on removing the smaller trees and retaining the larger trees. We appreciate that no trees greater than or equal to 21 inches dbh will be logged. We appreciate that all mechanical treatments are within 1.5 miles of identified [ldquo]values at risk[rdquo] and that most mechanical treatments are within [frac14] mile of these [ldquo]values at risk[rdquo].

Prescribed fire is likely the most efficient, cost-effective and ecologically beneficial way to reduce fuels across a forested landscape. The same can be true of managed wildfires under the right conditions. Therefore, we strongly support the prescribed burning levels proposed in Alternative 4. Significant levels of prescribed fire will go a long way toward reducing fuels across the project area in a cost-effective and ecological manner. After the fuel-reduction treatments are completed, we encourage the Forest Service to take advantage of post-treatment

conditions when faced with future wildfire in the area. When conditions allow, wildfire managers should be able to utilize the strategic fuel reduction treatments to allow future wildfires within the Ten Cent project area to burn in appropriate areas rather than relying on fire suppression. In this way, future wildfire may assist in achieving and maintaining the goals of the Ten Cent project.

Thank you for reviewing our comments. We very much appreciate the opportunity to participate in this planning process. Please feel free to contact me with any questions.

Sincerely,

Brian Kelly, Restoration Director

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