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Title: Conservation Director
Comments: June 18, 2018

Paula Guenther, District Ranger ATTN: Leslie Taylor

North Fork John Day Ranger District Umatilla National Forest

P.O. Box 158 Ukiah, OR 97880

Dear Paula,

I am writing on behalf of Greater Hells Canyon Council ("GHCC") to comment on the Draft Environmental Assessment ("EA") for the Willoughby Urban Interface Protection Project ("Willoughby project"). GHCC is a non-profit conservation organization based in La Grande, Oregon with approximately 1000 members and supporters. For over 50 years we have worked to protect and restore the inspiring wildlands, pure waters, unique habitats and biodiversity of the Hells Canyon-Wallowa and Blue Mountain Ecosystems through advocacy, education and collaboration, advancing science-based policy and protective land management. We actively participate in Forest Service proceedings and decisions concerning the management of public lands within the Umatilla National Forest, including the North Fork John Day Ranger District.

On behalf of GHCC, I'd also like to welcome you to the North Fork and the Umatilla National Forest. From reviewing the Willoughby EA, it is clear that you have a dedicated and hardworking team of folks working for the district. The draft EA clearly identified what issues were raised during scoping and how those issues were addressed. What analysis was done by resource specialists and how that analysis was incorporated into the project design. It is one of the better ones that I have reviewed.

Purpose and need of project

The stated purpose and need of the project is to reduce the fuel loadings within a quarter mile of identified values at risk (private inholdings or structures) and decrease flame lengths to less than four feet. Within one and a half mile of the identified values at risk the goal is to reduce the potential for crown fire and lofting firebrands into identified values at risk. There is also the need to create conditions to allow for firefighters to work safely in the area and increase the probability of protecting life and property

Proposed Action

The Willoughby project area covers 3,556 acres of Forest System Lands on Umatilla National Forest (Umatilla), North Fork John Day Ranger District. The project proposes the following actions.

[middot] Commercial Thinning (1,877 Acres) All trees over 21 inches in diameter at breast height (hereafter referred to as diameter) would be retained. Trees between seven and 21 inches in diameter would be thinned using heavy machines

[middot] Small Diameter Thinning (2,876 Acres) Small diameter thinning would remove trees less than or equal to nine inches in diameter to reduce fuels and reduce competition between remaining trees. This treatment would occur on all acres of commercial thinning, plus some additional areas outside those units

[middot] Pruning (93 Acres) After thinning, retained trees within the low intensity zones (within a quarter mile of values at risk) will be pruned (lower branches cut off) to further reduce ladder fuels

[middot] Landscape Burning (1,972 acres) Areas designated for landscape burning are proposed within dry potential vegetation group stands. This activity could occur approximately 3 years after thinning activities depending on whether windows and other operational considerations.

[middot] Maintenance Thinning and Burning (2,363 Acres) Thinning maintenance treatment would be similar to the initial thinning; however, it would focus on small trees, including new seedlings. Maintenance thinning would be used in dry upland forests within the landscape burn areas to prepare areas for maintenance burning. These activities could occur 3 to 30 years after thinning activities. The timing of maintenance treatments is dependent on semi-annual monitoring results.

[middot] Approximately 3.5 miles of fireline would be constructed along the private land boundary to contain the proposed landscape burning. The maximum width of the fireline would be 36 inches and it would be constructed by hand or with ATVs.

[middot] Grass and Herbaceous Seeding (100 Acres) Within three years of thinning and pruning activities, some stands and firelines would be seeded with genetically appropriate local native grasses and herbs.

[middot] Up to 17 miles of existing closed system roads will be reopened, maintained and re- closed after use. There would also be 1.4 miles of temporary roads that will be decommissioned upon completion of activities. Reopening a road could include removal of trees that have re-established in the road prism, blading, and gravel spot treatments.

[middot] Danger trees would be cut alongside haul roads or within treatment areas to meet operational safety.

Project design criteria were developed to address overall project objectives, to minimize resource impacts, and ensure Forest Plan and/or legal compliance. These criteria are comprehensive and listed in the draft EA

Comments on the proposed action and analysis

We appreciate that all activities in riparian areas will be limited to small diameter non- mechanical hand treatment and will follow best management practices thereby protecting these sensitive areas from adverse impacts. We also appreciate that the project protects old and large structure by following forest plan requirements and limiting the logging of trees to those 20" and smaller in diameter. Project activities will also avoid designated old growth stands and stands identified as old forest single story and old forest multi story. Wildlife habitat is being considered with habitat connectivity prescriptions that are consistent with the Umatilla Forest Plan as amended by the Eastside Screens. This strikes a nice balance between protecting the urban interface and protecting well-functioning aquatic and terrestrial habitat. Finally, we appreciate that the information resource specialists replied upon to do their analysis was clearly stated in their reports and was supported by field surveys and reconnaissance, best available science, and forest service data.

However, we remain concerned about the around of road reopening and the potential to increase motorized use within the project area. The proposed activities, while they will reduce fuel loading, will also significantly reduce the amount of cover for elk. This, in and of itself, may not make the area undesirable for elk but coupled with increased motorized use, it could push elk out of the area.

According to project documents, the Willoughby project area is summer habitat for elk and a small portion of the project area falls within winter range as well. Motorized use on Forest Service lands, during all seasons, is one of the most consistent variables in determining distributions of elk. The use of motorized vehicles in the project area, especially during hunting seasons, have pushed some elk to seek refuge on adjacent private lands. Willoughby Draft Wildlife Report p. 7. Due to project activities approximately 1,400 acres of satisfactory cover within the project area will change to marginal cover. Because of the expected reduction in satisfactory cover, these actions may decrease use of the area by elk, depending on the use of forest roads by motorized vehicles. Willoughby Draft Wildlife Report p. 12.

This project would re-open up to 17 miles of existing closed system roads that would then be reclosed after project activities commence. Reopening a road could include removal of trees that

have re-established in the road prism, blading, and gravel spot treatments. Draft EA p. 7. In other words, administratively closed roads that have also been functionally closed by vegetation encroachment will be improved so they are functional as travel routes again. This could increase motorized use in the project area. While these roads will be administratively closed after project activities cease, because they will be upgraded and suitable for travel, if they are not physically inaccessible, the public will likely use them. This would further degrade elk habitat in the project area.

Additionally, the re-opening of closed or unclassified roads for access, and then re-closure following treatment activities has very serious ecological impacts. Extensive and intensive road reconstruction greatly increase road impacts on watershed systems, as documented in Karr et al (2004).1 Reconstruction impacts are extremely

significant because the elevated sedimentation they cause is already ubiquitous water quality problem throughout the West and a major cause of the loss of aquatic biodiversity.

The project documents state that reopened roads will closed and/or physically blocked so that unauthorized motorized vehicles cannot access the road after project implementation. Please provide more detail on this project activity. Blocking entrances alone is often ineffective in preventing usage depending on topography and other site specific factors. We suggest restoring these re-opened roads back to a more natural state that truly cannot be used by motorized vehicles. This could include methods such as revegetation and waterbarring and removing fills and culverts. Doing so would also reduce watershed impacts.

Thanks for considering our comments. GHCC looks forward to working with you and your resource specialists on this and future projects.

Sincerely,

Veronica Warnock Conservation Director

Greater Hells Canyon Council

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1 Karr, J.R., J.J. Rhodes, G.W. Minshall, F.R. Hauer, R.L. Beschta, C.A. Frissell, and D.A. Perry. 2004. Postfire salvage logging's effects on aquatic ecosystems in the American West. BioScience 54: 1029-1033.