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Blue Mountains Biodiversity Project comments on the Notice of Proposed Action for the Pomeroy Danger Tree and Fire Salvage Project

To: District Ranger, Susan Piper
Attn: Pomeroy Roadside Danger Tree and Fire Salvage Project Comments
Pomeroy Ranger District
71 West Main
Pomeroy, WA 99347

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Hazard tree (aka "Danger tree) removal is often done on an annual or semi-annual basis with no need to use an "Emergency Situation Determination." So-called "Fire Salvage" logging definitely does not meet the requirements of an Emergency Situation determination, as unlike hazard trees that could soon fall onto the road and potentially hit someone, (not that this is very likely, given all the snags across the forest, with hardly anyone hit or injured by a snag), "salvage" sale units are off the road and obviously have snags[mdash]but does not present any unusual or immediate hazard threatening human health and safety. This is especially not an emergency situation, as the forest visitors entering the Forest do so knowingly at their own risk. The Forest Service handbook codifies the public entering the forest at their own risk. There are plenty of snags, including lightning and other fire-burned snags across the forest and within forest areas the public could enter at any time. Both the hazard tree logging and the proposed fire "salvage" sale units also don't meet other requirements for an emergency situation, including "mitigation of threats to natural resources on National Forest Service or adjacent lands" and avoiding a loss of commodity value sufficient to jeopardize the agency's ability to accomplish project objectives directly related to resource protection or restoration." (Notice of Proposed Action, p.2, emphasis ours)

In fact, burned snags, logs, and live trees are important natural resources themselves - for wildlife habitat structure, for carbon storage to slow or reduce climate change effects, for soil nutrient cycling, and for a natural setting for recreation. Removal of live trees, snags, and/or logs would not be directly related to any resource protection or restoration, but instead would cause detrimental impacts to soils, carbon storage, carbon sequestration if live trees are logged), and to critical wildlife habitat structure. Removal of this natural forest structure would reduce the natural biodiversity regenerated by wildfire and represent failure to protect natural resources, the opposite of restoration.

There should be no hazard tree felling along closed roads. The Forest Service does not keep up with maintenance of closed reads except for seasonally-closed maintained roads. The Forest Service needs to stop re-opening closed roads that are already overgrown, effectively blocked, or were closed to prevent ecological

damage or to reduce road density to Forest Plan standards. It's unusual for the Forest Service to propose hazard tree felling along closed roads.

We are strongly opposed to the second part of the purpose and need identified for this timber sale (aka "project"): "restore portions of the landscape burned by wildfire by initiating reforestation; and recover forest economic value and benefits through salvage, generating revenues to support the accomplishment of project objectives," (p.3)

First, there is no need to "restore" burned landscapes. These purposes and "needs" run counter to current best available science that finds: Wildfires create as much or more biodiversity than old growth forests. Naturally (recovering") rejuvenating burned forest is at a deficit on a landscape scale due to past fire "salvage" logging and more natural regeneration from wildfires is needed to be retained for forests as being critical to retention and increase of biodiversity, and to allow natural ecological processes and functions to occur for fire adapted native species' unique habitat niches to be created. Among wildlife species dependent on periodic wildfire - including fire at stand replacement severity are: Blackbacked woodpecker, Lewis' woodpecker, (and other woodpecker and nuthatch species that benefit), Olive-sided flycatcher, Lazuli bunting, and a vast array of plants, insects, and other micro-fauna, including plants triggered by fire to regenerate, which includes Lodgepole pine and Western Larch, as well as Fireweed, Ceanothus, and many other plants. Reforestation (typically only with timber-industry-preferred tree species) destroys a lot of the wildfire-associated biodiversity, especially when combined with commercial logging and heavy equipment use. The result of "salvage" logging and reforestation is generally homogenous, even age, single or few tree species plantations that increase flammability and insect outbreaks' extent.

The Ellis Sale DEIS admitted that despite an unprecedented massive timber sale proposed, the timber industry in eastern Oregon would continue to decline, with very few jobs created. The Forest Service needs to shift its mission to ecologically sound restoration, not continue using outdated silvicultural concepts and incentives to the point of no return for the forest ecosystem. This Notice of Proposed Action fails to consider all the current best available science that strongly refutes post fire logging, which by now is an overwhelming consensus. For instance, there is the book, Nature's Phoenix based on this science, and many science articles by Chad Hanson, Ph.D., Dominick Delasala, Ph.D., and many others. This Notice of Proposed Action fails to disclose significant scientific controversy over post fire logging regarding the Forest Service's outdated science and a huge current science consensus debunking post fire logging. I will send you some copies of articles listing numerous science citations against post fire logging later.

Regarding the stated "Need" on p.3, what specific "restoration" activities are planned that would necessitate postfire logging or hazard tree removal? Logging is not "restoration."

"High concentrations of fire-killed trees" (see p.3, last par.) are badly needed for foraging by many bird species, including especially Blackbacked woodpecker, but also other species such as Hairy woodpeckers and a variety of smaller birds.

Why are "severely burned areas" assumed to be "unlikely to naturally regenerate to a forested state"? This is not the norm at all. I have field surveyed many recently burned forest areas at stand replacement severity prior to planned post fire logging. They almost always have a profusion of new tree seedlings carpeting the forest floor, and tremendous plant regrowth of lupine, fireweed, grasses, Ceanothus, (and in the Deschutes NF, Chinquapin), and many flowing plants (in the Deschutes, lily species.) After post-fire logging, however, there is much torn-up barren ground, buried seedling and plant regeneration, and instead, a plethora of exotic invasive plants. The Forest Service should know this perfectly well. The Forest does not "need future land management interventions (p.3); it needs to be left alone to flourish. The only reason reforestation would be seen as "needed" is the tragic aftermath of post fire logging destroying natural post fire regeneration. The Forest Service is ignoring studies such as of regeneration of trees after the Biscuit Fire in Southwest Oregon, with natural regeneration being prolific and more successful than reforestation. This was a study by an Oregon State University/Corvallis.

The Umatilla Forest Plan is badly outdated and this Notice of Proposed Action reflects that. Forest Plan "desired future conditions" reflect the lack of Forest Plan revision, in that increasing the representation of "early seral" species should not be done regardless of site specifics. In this case, these are high elevation naturally moist mixed conifer sites. Ponderosa pine would naturally be limited to edges of stands and drier ridgelines with more clay or mineral soils instead of more moisture-retaining ash soils. The Forest Service would be decreasing tree species biodiversity by replanting to "increase the representation of early seral conifer species." What is "a reliable amount of time" for natural reforestation? Nature supports biodiversity and ecological functions at her own pace, not for industrial nightmares with legacy destruction, such as Forest Service timber sales have caused. Who choses "the desired species composition"? The timber industry aligned with the Forest Service, not the public, wildlife, or natural ecological processes.

The Forest Service needs to take advantage of other funding sources, such as finds for restoration, including a big Biden administration windfall, to do restoration and public safety projects without linking these to ecologically destructive timber sales.

The Forests have now been logged so many times over such a huge percentage of the landscape, that there is now really no situation where "timber production" is "not compromising the long-term sustainability of other natural resources." (p.4 under #3) Revenue from commercial timber sales is not primarily funding "activities within the sale area that further ecological function and sustainability." I've been monitoring the Umatilla NF timber sales of the past 30 years, and that is clearly not how the revenues are being used. This is also largely true of the other four National Forests we monitor.

The short and long-term effects of "salvage" post fire logging have already been extensively studied. The Forest Service is systematically ignoring much of that science with this proposed "salvage" logging. Research plots are an excuse to justify discredited post fire logging, not a primary motivation for this sale, which is to perpetuate a revenue stream.

We are greatly concerned by inevitable logging on steep slopes with ashy soils. This would cause major erosion, soil displacement, and irretrievable loss of the most fertile and moisture-retaining soil layer. The ash soil layer cannot be replaced except by massive volcanic eruptions. Yet ash soils are critical for the thriving moist mixed conifer forest. Skid trails from yarding are also very long-term soil damage. Ash soils are very easily displaced and would increase excess fine sediment into any streams downhill, choking out any fish runs downstream.

Roadside Hazard trees felled should be left onsite for down wood habitat and soil fertility or used for restoration projects, not removed for commercial revenue.

Timber sales are highly ecologically destructive[mdash]especially recently after a fire, and should not be used as "simply a tool to make implementation of this project economically and operationally feasible." (p.6) Further, that's a very disingenuous statement, seeing as the Forest Service still adheres to its outdated mission of generating timber sale[mdash]and stays funded through timber sales.

We do support many of the project design criteria, but not the extent and negative impacts of the timber sale ("project") itself. All felled hazard trees in RHCAs should be left within RHCAs. There should be no exceptions to this, such as tree removal from RHCAs where they "obstruct the operations of other contracts (haul routes)." (see p.g.6, par.5) We support there being no heavy equipment being allowed off the existing road surface.

"Fuel treatments" was not specified as part of the purpose and need, and should not be included in this proposal. A wildfire already reduced a lot of the pre-existing fire hazard. "Fuel treatments" (biomass removal) should not be done at all along scenic corridor routes or within Management Areas such as for old growth (DOFs or OGMAs), for wildlife habitat, for unique habitat (including Research Natural Areas), in Inventoried Roadless Areas or

Wilderness Areas, or in recreational designated areas.

Any slash or downed material should be left on site for nutrient cycling, carbon storage, water retention, and wildlife habitat.

We agree that the Forest Service needs to prepare at least an Environmental Assessment for this timber sale "project." (See p. 9 under "Effects and Issues to be Considered.") However there needs to be a full public comment period for an EA and a predecisional objection process, otherwise this timber sale "project" would violate NEPA. Three has to be another designated 30 day comment period for an EA. Although considering the considerable scientific controversy involved over post fire "salvage" logging, this timber sale really needs to be under a full Environmental Impact Statement, with a 45 day comment period and a 45 day objection period. (See statements to the contrary on p.2 of the Notice of Proposed Action, printed in Bold type.)

There are no specific parameters given for "fuel treatments" regarding any live tree logging, retention of snags and logs, width and length of biomass ("fuel") removal, etc. It's hard to adequately comment on a non-specific proposal. This is another reason why an EIS should be prepared, as full disclosure of plans, including in-depth, detailed analysis regarding effects to Forest Values needs to be prepared to inform public comment. There needs to be quantification of potential effects and identification of Forest Service goals, standards, and guidelines, and how these would be met.

The scale of post fire tree removal (logging) should be limited to hazard tree felling (and leaving in place whenever possible) along only major open roads, not along closed roads or relatively unused roads. The tree felling should be significantly scaled down by not including commercial logging in sale units away from immediate road corridors. 1,076 acres of commercial logging is excessive and not acceptable.

Felled hazard trees do not always need to be removed for public and employee safety unless they are damaged and leaning over the road or are felled across the road.

We support only existing landings being used. We support there being no construction of new roads[mdash]including "temporary" roads or new skid trails. "Temporary" roads are rarely fully decommissioned after use, and are often re-used as "existing disturbance, becoming de facto system roads. "Temporary" roads increase access for ATVs, illegal firewood cutting, livestock (if any), fur trapping, and invasive exotic plant introduction and dispersal. We oppose all "temporary" road construction.

The public needs to be able to see proposed design criteria for themselves to evaluate their potential effectiveness for comments on an EIS or EA.

There is already a great deal of good "understanding of the potential effects of management of burned mixed conifer forests." (See last par., p. 8 &, and 1st par., p.9).

NEPA requires inclusion of a "No Action" alternative in an EA or EIS as a baseline by which to compare the effects of proposed actions under the action alternatives. A No Action Alternative must be included for it to be a viable alternative.

Appendix A needs to be combined in the EIS with maps showing where these Management Areas are located compared to plan hazard tree logging and commercial sale units (if these are still included.) There are also needs to be effects analysis to consider how Management Area goals and standards and guidelines would be met or not met under proposed action alternatives.

Re: some of the Appendix B Project Design Criteria:

Avoid all tree cutting in special interest botanical areas. (BOT 4, p.13)

We strongly oppose any commercial logging or use of ground-based machinery within RHCAs, as any of either would be detrimental to riparian area values, and would defeat the purpose of the science-established RHCA buffers. There should be no ephemeral stream crossings, with no exceptions. (See WQ 12 p.15).

There should be no exceptions to fueling in RHCAs (WQ 14).

There should be no road and landing locations within RHCAs[mdash]with no exceptions.

We will be field surveying the "Pomeroy Danger Tree and Fire Salvage Project" timber sale as soon as we can access the area. Please let us know about snow conditions in the area.

Thank you for sending us a sale map.

Thank you for considering our comments.

For the Wild,

Karen Coulter