Data Submitted (UTC 11): 7/20/2022 12:00:00 PM
First name: Augustus
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Organization: Opal Creek Ancient Forest Center
Title: Facility Director
Comments: Hello Elspeth,

I recognize this comment is late but am hoping you will be able to include it to the scoping of the EA recently released regarding the treatment of danger trees along the fire affected roads of 2020. Please let me know if you have any questions, thank you!

Augustus Gleason

Opal Creek Ancient Forest Center

Facility Director

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Text of Attached Letter
Dear Elspeth GustavsonThank you for providing the Environmental Assessment for the 2020 Fire Affected Road System Risk Reduction Project in the Willamette National Forest. As a private land in-holder located in the Willamette National Forest, the Opal Creek Ancient Forest Center has known this area as home for decades. We have a particular interest in FS road 2209, which is the access road into our inholding (commonly known as Jawbone Flats) and the treatment proposed for this area detailed in the EA.Our previous scoping period comment addressed the 3.2 mile section of FS 2209 between the Opal Creek trailhead gate and our inholding was identified as ML-1 (closed). We observe this EA now identifies this section of road as ML-2. We agree this section of road is administratively closed to public vehicles, while open for all the uses identified in the Opal Creek Wilderness legislation of 1996 and the Opal Creek SRA EA and Decision Notice of 2002. Thank you for addressing our previous comment and correcting that error.First, we specifically note we are a forest education center partnering with the Willamette National Forest and have provided (and will continue to provide) forest ecological education and research opportunities from our inholding. Therefore, we are critically interested in the proposed treatment of the 3.2 miles of ML-2 road between the Opal Creek trailhead gate and our inholding. For decades, that route has been a primary introductory footpath for students and researchers to learn about the forest and the river and wildlife. Even post-fire, this route will continue to be our primary area of education, with a new curriculum now focused on post-fire recovery of the forest. Widespread danger tree removal in this area would disrupt natural post-fire forest succession processes and our ability to teach future foresters and scientists about natural habitats. We know, as forest ecology educators and scientists, that many of these trees are >48'' dbh and will take many decades to be at risk of falling. We comment that the educational use and integrity of this teaching forest be taken into consideration in the assessment process, with the goal that as few danger trees as possible be felled.Second, even if this portion of Road 2209 has a VQO of ''Retention'', it appears from the selection process (based on % crown volume scorch and bark char) all dead trees would still be felled and there is no opportunity for snag retention. Although there are many constraints and guidelines identified for this section of road 2209 (Appendix D, FS road 2209: Scenery, SRA, Wilderness, WSR1, etc), these management guidelines and constraints principally detail how to implement danger tree removal ''appropriately''. Many of the guidelines describe ''leaving felled trees'' or ''selling of timber prohibited[hellip]no salvage logging[hellip].flush cut stumps[hellip]cover the stumps with soil, '' while also protecting against ground disturbance. These are post-felling mitigation measures rather than assessment criteria that determine which trees legitimately constitute a clear and real-time imminent danger, i.e.: in danger of falling in the next year. We strongly disagree that every dead snag requires felling and urge you to take this into consideration. There should be a ''immediacy of snag falling'' time assessment factor taken into consideration in the assessment process to identify legitimate and

imminent danger trees.Third, we understand that the VOQ of "Retention" identified in the 1990 WNF Forest Plan and referenced in this EA states: "Activities should only repeat the natural form, line, color, and texture which are frequently found in the characteristic landscape. Changes in their qualities of size, amount, intensity, direction, and pattern should not be evident." We ask that you address and assess the fact that the post-fire natural form, line, color and texture of this forest at this point in its life cycle is this: standing snags. Therefore, any cutting of danger trees, as impacts to the visual resource, "should not be evident". Felling of danger trees and leaving them onsite, though better for the ecological integrity of the site than removing cut logs, is still visual evidence of management. Such evidence should be minimized by felling as few danger trees as possible.Fourth, We understand there are standing, fire-killed trees closely located along this portion of FS road 2209. Many of these standing snags are also structurally part of the historic road & public trail. Cutting these trees will undermine the stability of the road & trail infrastructure. We ask that you consider this factor in individual danger tree identification and assessment.Finally, we comment that the danger tree selection process addressed above, and within other additional, related small projects (such as the Hazard Tree Clearing at Developed Recreation Sites CE) will overlap in timelines, as highlighted in this EA. The post-fire management of the entire Opal Creek SRA should be informed and updated by a re-established Opal Creek SRA advisory council and an updated management plan. It is hard to currently imagine how some sensitive areas, such as Opal Pool, will be accessed in the future as a recreation site. These sites may be in a sensitive state for decades. We request that SRA stakeholders be systematically involved in the scenic retention and VQO criteria assessment processes for how the final danger tree treatments are developed and implemented.Respectfully,Augustus GleasonOpal Creek Ancient Forest CenterFacility Director