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Via: US Forest Service NEPA Projects Home ([usda.gov](https://usda.gov))

Susan Piper, Pomeroy District Ranger

71 West Main Street

Pomeroy, WA 99347

Comments on the Sunflower Insect & Disease CE Project

Dear Ranger Piper,

I'm writing on behalf of the Greater Hells Canyon Council (GHCC) to provide comments on the Sunflower Insect & Disease CE Project.

GHCC is a non-profit conservation organization based in La Grande, Oregon. Our 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. GHCC actively participates in Forest Service proceedings and decisions concerning the management of public lands within the Umatilla National Forest. We are an "interested public" for timber sales.

Thank you, sincerely, for the opportunity to provide these comments.

#### Sunflower Project Description

The Sunflower project is located in the Pomeroy Ranger District of the Umatilla National Forest. The project area is in Columbia County, Washington. It is primarily in the Upper Tucannon River Watershed, with lesser portions in the Upper Touchet watershed.

Thinning by commercial and non-commercial treatments is proposed for 2,902 acres of National Forest lands.

As described in the Forest Service Purpose and Need for the project, the Sunflower Project is intended to:

- reduce and/or mitigate the effects of insect and diseases
- increase resiliency to fire through fuel reduction
- sustain local economies
- reduce forest stand densities and alter species composition.

#### Proposed Action

The Proposed Action includes:

- 1,340 acres of commercial mechanical thinning (logging)
- the majority treated by cable and/or tethered logging systems
- grand fir/ white fir up to 30" dbh proposed to be cut
- other species limited to 21" dbh
- 1,562 acres of non-commercial thinning (by hand and mechanized systems)

slash disposal by hand or machine piling and burning, lop and scatter, or mechanized mastication  
non-commercial treatments in Riparian Habitat Conservation Areas (RHCAs)  
no treatments proposed within Inventoried Roadless Areas (IRAs)  
approximately 8 miles of temporary roads  
may include tree planting, native seeding, and weed treatment.

#### Authority

The project would be conducted under Section 603 of the "Healthy Forest Restoration Act" (HRRA).

#### GHCC Comments on the Sunflower Insect & Disease CE Project

##### Limitations of HFRA Section 603

Section 603 of HFRA imposes limitations on the use of a Categorical Exclusion (CE), including that the project shall be located in the Wildland Urban Interface (WUI), or if outside the WUI in an area in condition classes 2 or 3 in Fire Regime I, II, or III.

Please address that these conditions are being met in this project. Thank you.

Also, the use of a Section 603 CE does not allow activities inconsistent with the applicable Land and Resource Management Plan.

Please address that the project does not require any amendments to the Forest Plan. Thank you.

##### Wildland-Urban Interface (WUI)

We have not been able to accurately interpret the meaning of the "Wildland-Urban Interface Map" provided with the materials for the project. The map shows a series of lines, however it's unclear to us how much of the project and the proposed treatments may be within the WUI. The project documents do not seem to include a narrative description. Clarification would be appreciated. Thank you.

##### Treatments for Fuel Reduction

The Purpose and Need statement for this project includes the need to "make the project area more resilient to fire-disturbance through the reduction of hazardous fuels."

We generally support a strategic approach to fuel reduction treatments with a goal to protect values at risk and the safety of the public and firefighters. These goals may be achieved through limited vegetation treatments on specific and strategic locations on the landscape to assist fire managers in the event of a wildfire, rather than widespread and /or heavy logging across extensive forest acreage.

This approach can be implemented using potential wildland fire operational delineations (PODs), potential control lines (PCL), and defensive fuels profile zones (DFPZs).

Potential control lines can be identified and reinforced with fuels reduction treatments anchored into the existing road system and reinforced by natural barriers, wildfire scars, and/or past vegetative treatments. These treatments would not be designed to stop a wildfire by themselves but would provide suppression forces a higher probability of successfully attacking a wildfire with indirect suppression tactics such as "burn outs". These fuel breaks would be utilized to limit fire size by compartmentalizing the project area and creating PODs. Compartmentalization of the project area would increase opportunities for future planned and unplanned fire.

### Fuel Reduction and Values at Risk

Fuel reduction treatments are most effective for protecting values at risk when they are implemented adjacent to those values. For example, according to the National Fire Protection Association, "Experiments, models and post-fire studies have shown homes ignite due to the condition of the home and everything around it, up to 200' from the foundation. This is called the Home Ignition Zone (HIZ)."

<https://www.nfpa.org/Public-Education/By-topic/Wildfire/Preparing-homes-for-wildfire>

### Logging Large and Old Trees

We strongly oppose the logging of any species of large trees (21 inches or greater in diameter at breast height) as proposed in Scoping. The largest trees are the most-fire-resistant trees. Logging the largest and most fire-resistant trees would create the opposite effect of the desired conditions of forest resiliency for the project.

Additionally, the largest trees are the largest sources of carbon sequestration in our forests. Logging the most productive carbon-sequestering trees would create negative environmental impacts for the huge challenge of climate change. We believe you can meet the purpose and need of this project without logging these important wildlife and wildfire resistant trees. Please do not do this.

Further, the removal of the standard within the Umatilla Forest Plan that prohibited the logging of trees 21" and over (commonly known as the 21" rule) was done through a flawed process that was both procedurally and substantively inconsistent with the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). Any action taken pursuant to the amended management direction for large diameter trees would also be inconsistent with both NEPA and NFMA.

If you do decide to go ahead with this activity please disclose the number of trees 21" and over that will be logged; the species, age and size of these trees, and how many acres of forest within and/or outside stands classified as Late and Old Structure will include large tree logging. It is near impossible to determine the effect of large tree logging without this information.

### Logging in Undeveloped Lands

We strongly advocate that the footprint of all mechanical treatments should be limited to lands that were previously logged and roaded. Undisturbed forest soils should remain undisturbed. Un-roaded lands should remain un-roaded.

We request that previously undisturbed forest soils are protected from machinery, and that landings, skid roads and other project activities are limited to within the footprint of previous roads, skid trails, landings, or otherwise previously-impacted soils.

### Connectivity of Wildlife Habitat

We strongly encourage the Forest Service to adopt the vegetation treatments that best protect habitat connectivity across the project area. Please locate logging units, non-commercial treatments, and fuel reduction treatments away from connectivity corridors as much as possible and modify prescriptions within connectivity zones.

We recommend that wildlife habitat connectivity and permeability should be included as an important component of the "Purpose and Need" for this project.

One of GHCC's top concerns is the impact of agency management activities on wildlife connectivity. For many of our native wildlife species, survival depends on movement - whether it be day-to-day movements, seasonal migration, gene flow, dispersal of offspring to new homes, recolonizing an area after a local extirpation, or the shift of a species' geographic range in response to changing climate conditions. For most animals and plants, all of these types of movement require a well-connected natural landscape. There is abundant scientific evidence that loss of habitat connectivity has profound negative impacts on fish, wildlife and plant populations.

Alarming, habitat loss and fragmentation is a cause of decline for about 83-percent of U.S. species. As climate change accelerates and increases, protecting habitat connectivity is widely recognized as one of the best adaptation measures managers can take. This vital role that habitat connectivity plays in ensuring long term species' viability and the disastrous effects of habitat fragmentation has inspired a growing call to action to address these issues through big-picture collaborative efforts.

Connectivity needs to be considered for a wide variety of organisms, ranging from those extremely limited by mobility to big game. Movement to and from large core habitat areas should be consciously planned for. All roadless areas, even areas under 5000 acres, should be protected. The functionality of riparian areas as wildlife corridors should be considered. While not all species would be covered by this approach, riparian areas are likely natural wildlife corridors where extra-large buffers or some other approach would help plan for day-to-day wildlife movement and dispersal needs.

[2https://www.nature.nps.gov/biology/migratoryspecies/documents/WGAWildlifeCorridorsInitiative.pdf](https://www.nature.nps.gov/biology/migratoryspecies/documents/WGAWildlifeCorridorsInitiative.pdf)

#### Carbon Sequestration

Importantly, recent research increasingly shows that Oregon's forests are incredibly important for carbon sequestration, and that logging contributes more to Oregon's carbon emissions than forest fires. Please see the following articles for more information.

<https://www.hcn.org/issues/50.11/climate-change-timber-is-oregons-biggest-carbon-polluter>

<https://www.pnas.org/content/115/14/3663>

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/59dd4984a8b2b090a38f07a1/1507674513035/2017-OGWC-Legislative-Report.pdf>

#### Temporary Roads

We are concerned that approximately 8 miles of temporary roads are proposed. This is a large amount of temporary road mileage for a project of this size.

We realize that these roads are required to be decommissioned after use. However, we've observed on the Umatilla National Forest and elsewhere that temporary roads may become illegal motorized travel routes after decommissioning.

Temporary roads are not temporary in impact. Temporary roads left in a state of non-use can have impacts on forests and soils that last for decades. The public often continues to use these roads long after implementation of camouflaging and other activities designed to leave them in a state of non-use. As a result, soil compaction/disturbance and sedimentation impacts will continue to persist. The permanent impacts of temporary road construction have been thoroughly documented.

We recommend any potential units that can only be accessed with temporary roads either be dropped and considered as wildlife refugia, or be non-commercially treated by hand crews. We recommend the same regarding reopening of closed roads, unless there are roads which are currently causing resource damage and that could be restored.

#### Tethered Logging

The Project Description states, "The majority of the treatment areas would be harvested using a cable and/or cable-assist (tethered) logging systems, with some areas using ground-based equipment."

The use of a Section 603 CE does not allow activities inconsistent with the applicable Land and Resource Management Plan.

Please clarify how tethered logging is addressed in the Forest Plan for the Umatilla National Forest.

We do not recommend the use of tethered logging for this project. Tethered logging would use ground-based logging equipment on steep slopes. Steeper slopes are more vulnerable to soil compaction, rutting, and soil displacement. Steeper slopes are at a higher risk of water runoff and soil erosion due to ground disturbance from logging equipment.

Cable or skyline logging does result in impacts to the soil, however the results are less detrimental to soils than those of ground-based equipment, according to research and monitoring efforts.

#### Conclusion

Thank you for the opportunity to participate in this planning process and for your review of these comments. GHCC looks forward to working with the Forest Service as this project progresses. Please don't hesitate to contact me with any questions.

Sincerely,  
Brian Kelly  
Brian Kelly, Restoration Director  
Greater Hells Canyon Council