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Title:

Comments: Regarding: USDA FS North Fork Crooked River Forest Resilience Project, Scoping,
<https://www.fs.usda.gov/project/?project=61651>.

District Ranger Johanna Kovarik:

The Juniper Group, Oregon Sierra Club, representing over 1500 members in Eastern Oregon counties, has the following comments on the scoping package for North Fork Crooked River Forest Resilience Project, 61651.

The overall scoping packet looks reasonable, but we have several concerns we would like you to consider at this point.

One is road density. We applaud the few miles of roads you are proposing to close and decommission. As you note, this is important for wildlife security, reducing visitor impacts, and other reasons. We encourage even more closure and decommissioning. The roads that remain with this project still affect elk security habitat as well as water quality and habitat fragmentation. Closing more roads, and ensuring no user opening of such roads, such that there is several miles between road surfaces will still allow recreational access and improve wildlife habitat. It is common on the Ochoco National Forest (ONF) to see user roads created over project temporary and closed roads, with no enforcement of such violations.

Another concern is the possible harvest of large trees. The Eastside Screens has recently been amended to allow harvesting of some large-diameter trees, but we continue to actively oppose any such action. The statement in question is on page 7 of the scoping document:

[ldquo]Ponderosa pine, Douglas-fir, and western larch larger than 21-inch dbh and grand fir larger than 30-inch dbh will usually not be cut to maintain or promote late and old structural forest.[rdquo]

The [ldquo]usually not be cut[rdquo] should instead state that there will be no cutting of any tree over 21-inch dbh, including grand fir.

We also question the purpose and need for thinning. While some thinning for fuels reduction may be appropriate, there is a growing body of evidence that such work will, in many cases, increase the intensity of wildfire.¹ This happens in part because thinning allows greater drying of the forest floor due to increased wind effects and solar heating of the ground vegetation and downfall. Such work is also damaging to the soil and to root and fungal connectivity, interferes with natural soil building processes, and often increases soil erosion. The increased carbon released by thinning activities is also counter to well understood needs for carbon sequestration to help counter climate change.

We also wonder if the cumulative effects of this project, along with the neighboring projects named on page 4 ([ldquo]Black Mountain (signed 2019), Gap (2016), Wolf Creek (2014), and Jackson (2012)[rdquo]) have been considered. Are enough dense stands of trees being left for elk security habitat? Will this large, cumulatively managed area retain natural species diversity and complexity to support native species? With the removal from these combined projects of all similar sized trees and tree species, what remains is not the natural mix of flora seen in a healthy ecosystem, and may not be appropriate for the changing climate in central Oregon.

Grazing is a continuing problem across all of the ONF and is barely addressed in this project. Efforts to reduce grazing impacts on the forest, by reducing the number and size of allotments, should be made with this project. With the ongoing drought we have in central Oregon (and across the West), the ONF should be making changes now to reduce the impacts of grazing on this forest.

Conclusion

We encourage the Forest Service to consider the concerns we have described above. At this scoping stage, this project is simply [ldquo]doing business as usual[rdquo]. We want the ONF to go beyond the usual and look toward the long range health of this forest and the expanded demands of the many user groups who want to enjoy this public, natural resource.

Sincerely,

/s/ Mathieu Federspiel

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1 Bradley, C. M., C. T. Hanson, and D. A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? *Ecosphere* 7(10):e01492. 10.1002/ecs2.1492