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Organization:

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Comments: To Whom It May Concern,

I would like to voice my caution and concern with the planning and wording of the Tie Project on the McKenzie River Ranger District.

Having grown up in Rainbow on the McKenzie River just miles downriver from the Flat Country neck of the woods, I am quite familiar with the Tie Project area. Over the years, I have personally spent time in this area, trail running, hiking, backpacking, hunting, cutting Christmas trees, and camping. When I worked for the Forest Service on the McKenzie River Ranger District from 2010 to 2013, we also fought fires in the Flat Country area, including on the Scott Mountain Fire in 2010. Our project work days also included tree thinning, stacking and covering piles to burn, and other "Forestry Technician" jobs.

This Tie Project area has historically been heavily logged since roads were first built, over half a century ago, so I can understand the desire to keep logging this area with its gradual slope and extensive road system.

My concerns for writing this comment are for two reasons:

With the mandated increase for timber harvest at the federal government level in 2025, I am worried that the quality of the work being done will be greatly reduced.

I have seen that the effects from thinning and the slash left behind are creating conditions where fires can and will burn hotter in the future. Many current logging projects are doing the opposite of what the "Purpose and Need" states, pertaining to wildland fire.

For concern #1: If much of the Forest Service's work is being outsourced to private contractors, how will a standard of quality be maintained and followed up on? If the Forest Service is being mandated to double timber harvest and logging, how can we be sure that each and every step along the process will be checked and approved to the standard public lands deserve? Most, if not all, of the contractors being hired to fill these roles will be from the private timber industry sector, which has a much different mindset and different standards from public lands. Will all of these new timber sales be double-checked along each step of the process to achieve the multiple-use values that the Forest Service and public lands were founded on?

For concern #2: So many of the timber sales I have seen completed in the past 5 years have had shocking amounts of slash left behind. Many only had grapple piles that were piled and burned along the roads, with little or no work being done inside the actual units. With the mandated targets for logging, I just don't see how the quality of work can be achieved to actually reduce the risk of higher-severity fires into the future.

If the new standard is to hardly do any hand-piling or underburning after logging, then I would ask that all future "Purpose and Need" statements not include "Fire Risk Reduction" when it comes to "Thinning Projects". When I attended the community meeting hosted by the McKenzie RD and Sundance contractors in Leaburg on 12-4-25, it was stated by leaders of the project that the "Shaded Fuel Breaks" were intended to reduce fire risk, but the thinning projects were actually only intended for logging and timber targets. If this is truly the case, since Shaded Fuel Breaks retain canopy cover and thinning or logging does not, I would ask that thinning projects no longer be automatically presented as "Fire Risk Reduction," as this would be misleading the public for the "Purpose and Need" of the project.

From all of the examples I have seen from the Bootleg Fire in Oregon, along with current research, the most effective way to actually reduce fire risk with thinning is to also include low-intensity underburning after thinning to

actually reduce fuels on the ground. Otherwise, you are just removing the non-burnable tree trunks and leaving behind too much slash that will fuel future fires, and you are not resetting the fire return interval at all.

If you look at the attached photos of past thinning projects completed on the McKenzie Ranger District, you will notice the amount of sunlight hitting the ground during the heat of the day during summer. It was quoted at the community meeting that an average of 40% canopy retention is expected to be retained throughout thinning. If this is true, the benefits of fuel breaks being shaded would be very much lost from thinning. Combine this with the logging slash left behind, and you are creating the perfect conditions for increased fire intensity as fuels quickly dry in the exposed summer sun. If you layer extreme winds on top of fires, fewer trees in the forest create less of a wind break, also increasing fire intensity.

I want to acknowledge and appreciate that shaded fuel breaks can give firefighters options when future fires do come back to the Flat Country area. Having roads prepped for anchor points and back burning before fires start will hopefully increase the quality of the work being done along these roads. Creating shaded fuel breaks before fires will also hopefully make planning and oversight more effective, instead of it being hectic during fire suppression. I also want to acknowledge that shaded fuel breaks will NOT work at all if strong winds of 40-80 mph are added to fires. Shaded fuel breaks and thinning WILL NOT stop another Holiday Farm Fire.

From my understanding, there is a very large backlog of pile burning that needs to be done on the McKenzie Ranger District. If you double the amount of logging, this will add to the backlog of burning. On top of that, if the Forest Service is only underburning 1-3 units a year (we completed 3-6 units a year while I worked at the Forest Service), you will not be able to effectively reduce fire severity. I would think you would actually be adding to the fuel on the ground from all of the logging.

If this is all truly the case, I would ask that you accurately present what is happening and not confuse or conflate the different "Purpose and Needs" stated on all future project documentation. The way that this current scoping letter is written makes it sound like thinning is being done to reduce fire severity, which is not the case, as stated at the community meeting.

In closing, I understand that the Forest Service is mandated to increase logging, but please do so in a way that prioritizes forest health and community and ecosystem resilience with fire, by actually reducing fire intensity across the landscape.

Thank you for taking the time to read this comment and for stewarding our National Forests. If I have misunderstood anything stated in the comment, please reach out, as I would very much like to gain a better comprehension.