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Comments: Comments on USDA Willamette National Forest Tie Project, Lane County, Oregon

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Landscape Scale. I very much appreciate the 37,000 acre landscape-scale of this proposal, as well as the size and organization of the management areas bordered by the "shaded fuel breaks." I am assuming these are based on a network of riparian and ridgeline access roads, which I also strongly support maintaining. The restriction of planned actions to only 7900 acres of the total, and questionable treatments to those areas, is a principal concern.

My following comments and recommendations are based entirely in support of continuing this planning process -- but focused on treatments that address the entire polygons created by the designated fuel breaks, rather than just the 7,000 acres of dozens of same-colored, relatively tiny polygons on the planning map. As important comparison, the Holiday Farm Fire reached 37,000 acres in one day and was more than 100,000 acres after two. That's two large-scale and basic polygons of necessary planning consideration for the McKenzie River basin.

Project Purpose. Here are the stated purposes of the Tie Project: "The purpose and need for this project includes, (1) Providing a sustainable timber supply to support local economies, (2) Reducing wildfire risk through strategic thinning and shaded fuel breaks, (3) Improving forest health and resilience by enhancing forest structure, species diversity, and stand density, and (4) Maintaining and improving road systems for management, recreation, and wildfire response."

My immediate response is that these purposes are barely addressed in the project as it is currently described, but are definitely greatly needed by local businesses, communities, wildlife, and taxpayers. Purpose (1) reports the words of the 1897 Organic Act, then proposes little of the sort to barely address that objective; purpose (2) appears to be a waste of taxpayer money, given the recent histories of the Holiday Farm, Cedar Creek, and Emigrant Fires; purpose (3) sounds nice, but the word "enhancing" says it is just a value judgment made by somebody at some point -- not a real objective; and purpose (4) could readily be covered by 75% of log sales from the thinnings, as had been done for nearly 100 years, rather than funded by taxpayers in anticipation of future "managed wildfires."

Primary Concerns. My primary concerns with this proposal are: 1) lack of historical landscape research identifying precontact cultural vegetation patterns, rare plants, old-growth, plantations, and opportunities to reintroduce traditional burning practices to the project area\*\*, 2) 25% of sales are not allocated to county schools and roads as required by law; 3) taxpayer-funded "shaded fuel breaks" when no fire exists and where forest roads have traditionally been paid for and maintained through log sales and recreational fees; 4) no substantive action taken to mitigate the negative effects on biodiversity and crown closures created by industrial plantation projects; and 5) plans to spend taxpayer money on road closures, road "decommissioning," and skid trail landscaping.

1897 Organic Act. In 1897 Congress passed the "Organic Act" to manage and protect the recently created US Forest Reserves. The bill was signed into law by President William McKinley and has never been repealed. The guiding principal of the Act remains fairly well-known to this time, and is the stated basis to all subsequent US

Forest Service (USFS) planning:

"No public forest reservation shall be established, except to improve and protect the forest within the reservation, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States."

A lesser-recognized portion of the Act also states it was "for the purpose of preserving the living and growing timber and promoting the younger growth on forest reservations" -- and, in that regard, authority was given to "designate and appraise so much of the dead, matured, or large growth of trees found upon such forest reservations" for sale at "not less than the appraised value."

Act of May 23, 1908. (16 U.S.C. 500) increased 1905 USFS statutory 10% payments to 25% of all revenues generated from National Forest activities to the states in which those forests are located. Those funds are then distributed to the counties within those states that contain portions of National Forests and must be used specifically to benefit public schools and roads.

Shaded Fire Breaks. This designation for the Tie Project seems to be an existing functional network of riparian and ridgeline road networks. These are ideal access routes for recreation, active management, and maintenance purposes, as well as for fire control. In the past these roads were constructed with timber sale dollars, as outlined by law, and it seems odd that taxpayers are now paying for this upkeep through the threat of future wildfires.

"Variable Density Thinning." This concept was pioneered on OSU Research Forests while I was a student Cultural Resource Manager. It was based on the theories and modeling of Norm Johnson, Bill McComb, and John Sessions, with associates. This method does not replicate "natural habitat," is very expensive to implement, and was quietly abandoned by OSU after a few years because of cost and ineffectiveness.

In a forested environment that can be massively altered in a few hours' time by catastrophic wildfires, windstorms, and landslides, these costly "boutique logging projects" disappear in an instance. My vote is to remove the fuels and restore the native forests, prairies, meadows, and major wildlife species on public lands.

Plantations. In my reforestation career I planted more than 2 million trees and my crews performed more than 80,000 acres of successful reforestation projects -- thousands of acres of which have been subsequently logged and replanted, and none of which are known to have been burned in a wildfire. Many of these projects involved mechanical scarification or broadcast burning to treat and remove fuels before planting.

Industrial plantations are the antithesis of biodiversity and directly suppress native plant and animal populations. In addition, these plantations create a contiguous crown of pitchy fuels that can carry a deadly wildfire over thousands of acres within a few hours. If we are managing for fiber production and products for the American public, then plantations need to be better managed for those purposes; however, if we are managing to "restore" native habitat and wildlife populations to earlier times, then we need to conduct research to determine which time period might currently be best favored for future generations, and how to produce.

Old-Growth. According to a 2024 USDA and USDI Report, from 2000 through 2023 about 9,000 acres of US old-growth were logged; more than 180,000 acres were lost to bugs and disease; and 700,000 acres of old-growth were lost to wildfire. Any trees in the Tie Project in excess of 160 years needs to be clearly identified and located, and all efforts immediately made to remove competitive trees and ladder fuels ASAP and hopefully produce a profit for taxpayers in the process.

\*Please note that my representation of NWA is voluntary and technically unofficial because the grassroots basis of our organization is just now being formalized for a second time; however, these perspectives have long been discussed and debated by key NWA members and are certainly representative of most or all members. A second

note is that I am currently running for a political position in Lane County that includes the Tie Project within the voting district. That being said, I have researched and written about eastern Lane County wildfire and forest management issues for several decades, much of it in collaboration with ORWW, and these comments follow in that vein. If questioned politically on these issues, however, my responses will likely be the same.

\*\*An additional note is that I am currently communicating with key forest and wildfire research experts at OSU and UO regarding the potential for conducting historical research on the Tie Project, Jim's Creek Project, and Taylor Burn. These are methods and locations I care strongly about and will continue to advocate for this process in management planning on our public forests. Economic studies of the Cedar Creek Fire and the Tumblebug-Emigrant Fire are also topics of personal and organizational (ORWW) research interest.