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Comments: In my time as the District Ecologist at the Sisters Ranger District from 1990-2016 I served on many Teams addressing wildfire impacts (BAER) and multiple salvage sales. I am concerned that the District is being forced by the administration to expedite this salvage sale with minimal analysis in an area of important deer winter range. My concerns are below:

Inadequate time for public comment and analysis.

Most disturbing is the lack of a reasonable public involvement period to allow comments on concerns of fire salvage and the direct, indirect, and cumulative effects on public land. Fire salvage is one of the most controversial activities the Forest Service does and has scientifically debatable ecological value. The scientific controversy alone would bump this to an EIS in normal times. These are public lands and the public has the right to have a reasonable amount of time to study the proposal and provide comments so the decision maker can make a well informed decision. Having 7 days is a huge shift from past practice to ensure a well informed decision and a change that few people know about. This takes the Forest Service in the opposite direction from collaborative, responsive land management and level of public trust in the Government that we worked so hard to establish since the 1990's.

Sale viability

Many fire salvage sale units we planned (in Eyerly, B&B) with much higher value trees did not sell. This fire area is largely second growth, small trees without much value alive and even less value when burned. With hundreds of thousands of acres of burned forest across the west there will be an abundance of dead trees, many more valuable than the scrawny dead second growth here.

What is the likelihood that the time and money spent will result in value to the timber industry and the public? Is there adequate volume for a viable sale? If the units do sell will expected receipts produce enough KV to reforest, replant, and do invasive plant control ?

These second growth areas are not money makers even when alive. If the effects analysis is based on mitigations that are not likely to occur then the analysis is faulty.

There are so many areas that need the Forest Services attention such as popular recreation spots, the many deteriorated high use roads, and completing priority actions and mitigations in treasured landscapes, Wild and Scenic River plans and other projects that have been approved.

Bitterbrush planting

The plan to plant bitterbrush is admirable but needs to consider whether local native bitterbrush seed is available in the quantities needed. Bitterbrush has substantial genetic/ecotypic variation that affects its resistance to drought, heat, nutritional quality and palatability (https://www.fs.usda.gov/rm/pubs/rmrs_gtr136_2.pdf?utm_source=chatgpt.com). The right seed source matters to ensure that it will actually grow here. The area has low rainfall (~10-15 inches a year) and low productivity soils. With the loss of shade from standing and fallen dead trees and ground disturbance, the growing conditions will be even more harsh. Restoration literature recommends matching the ecotype/seed source to the intended environment (<https://research.fs.usda.gov/feis/species-reviews/purtri>).

What bitterbrush seed source or ecotype is proposed for use in the Akawa Butte area, where was it collected and how closely do its climate, elevation, soils, and drought regime match the areas being reseeded?

Effects of soil disturbance on revegetation success and Invasive plant spread

Disturbance by heavy equipment which removes what little A -horizon and organic material left after needle fall makes conditions even more harsh in a dry area of low soil productivity. These are conditions where invasive plants such as cheatgrass and medusahead which are in the area often thrive. We saw roadside fuel breaks in the Black Crater fire area become fields of cheatgrass in 1 year. See photo. These invasive plants will compete aggressively with any seeding and tree planting. If soils are not damaged, as seems to be the case here, there should be cached bitterbrush seed that will come back on its own. Ground disturbance will destroy many seed caches.

Reforestation success and Tree survival

Expected trends in the watersheds of Sisters indicate conditions are becoming more harsh and it will get even more difficult to recover burned forests.(see Watershed Analysis done on the Metolius and Whychus watersheds)

Temperatures are increasing, there is more drought, less snow, expanded insect infestations, and drought induced tree mortality. This region and much of central Oregon are in extreme drought status according to the US Drought Monitor (droughtmonitor.unl.edu). Ground disturbance and loss of the organic material, shade and moisture that dead trees provide both standing and on the ground will make reforestation even more difficult.

Hazard trees and road densities

Much of the Akawa Butte fire area is remote and has little human use. There are cheaper and more effective ways to deal with hazard trees such as road closures on some of these low use roads or dropping and leaving trees. Improving these roads where few people go now creates new hazards and problems with human fire starts, invasive plant spread, and wildlife disturbance. Road densities in most of the Sisters Ranger District exceed Deschutes Forest Plan standards. This would be an opportunity to move towards complying with road density standards.

What is the road density in the project area and how will you comply with the Deschutes Forest Plan S&G's?

Decks of cut trees along roadsides

I have no issue with these being removed and has been the conservative approach used in other fires to limit disturbance and provide economic value.

Retaining large trees

Thank you for recognizing the importance of retaining larger dead trees on the landscape. They will take decades to replace, if even possible, with drought and hotter temperatures. They have extreme value to the recovering forest as structure and habitat that will not be seen again in our lifetime. There probably are not many out there. Please be diligent in protecting those that may remain.