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Comments: RE: District-wide Danger Tree Removal Project - Emigrant Creek Ranger District - Scoping

FROM: Doug Heiken, Oregon Wild | PO Box 11648, Eugene, OR 97440 | 541-344-0675 | dh@oregonwild.org
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ATTN: Lori Bailey
DATE: 21 Nov 2017
RE: District-wide Danger Tree Removal Project - Emigrant Creek Ranger District - Scoping

Please accept the following scoping comments from Oregon Wild regarding the proposed District-wide Danger Tree Removal Project - Emigrant Creek Ranger District, https://www.fs.usda.gov/project/?project=52029. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy.

* The objective of public and worker safety is laudable, but there are gradations of risk based on characteristics of the site and the tree and the type and amount of public exposure, so felling of hazard trees must be balanced against other important objectives such as wildlife habitat, carbon storage, water quality/stream shade, etc.
* The agency should consider alternative means of managing hazards from falling trees, such as (1) minimizing human activities near hazard trees (closing roads). This may not work where a hazard trees is adjacent to a high traffic road, but some little used roads can be closed. (2) topping trees so they are too short to reach the road when they fall, and (3) placing signs to warn people of the hazards so that people can evaluate the risks for themselves. Often the hazard is not from the tree falling directly on people, but from cars colliding with trees that have previously fallen. This hazard can be mitigated with signage and speed limits, while allowing valuable wildlife trees to persist.
* The agency should only fall trees that pose an imminent hazard to the public. There is little need to fell trees that lean away from the road. Trees more than 100 feet from the road have a low probability of falling on the road, even if they are taller than 100 feet. This is because of all the cardinal directions these trees could fall, only a small subset would reach the road.
* The agency should focus on roads that are heavily used by the public and workers. There is a trade-off between safety and habitat, and the agency should conserve defective trees and snag habitat in areas that receive little public use.
* The agency should fell trees as absolutely necessary, but wherever possible leave the trees on-site to provide down wood habitat. When tree removal is necessary use the wood to restore stream habitat or to add down wood to previously clearcut plantations where down wood habitat is severely lacking.
* We urge the Forest Service to leave the felled hazard trees on site to provide dead wood habitat, carbon storage, soil conservation, etc. This is especially important in areas such as RHCAs, IRAs, DOGs, etc. But honestly, retaining large wood is important everywhere because there is already a region-wide shortage of large snags, and this project will make that shortage worse. Alternatively, the FS could use the felled trees for restoration projects such as stream restoration, or adding large wood to old clearcuts that have too little wood. We urge the FS to avoid commercial sale of hazard trees, because there are economic conflicts of interest that could lead to ecologically important large trees being removed for the wrong reasons. And the need for large trees for restoration purposes far outstrips the supply.
* The cumulative impact of hazard tree removal needs to be carefully considered. There is a dense road network across the federal/non-federal landscape and if all the hazard trees are removed a certain distance from

all those roads, then the area of the forest that can support large snags become greatly diminished. The cumulative effects analysis must also account for the lost potential for high quality large snag habitat caused by past regeneration harvest and salvage logging. The NEPA analysis should disclose how the forest can meet DecAID 50-80% tolerance objectives given the cumulative loss of large snag habitat.

The risk of a dead trees actually falling and hitting someone is extremely remote and must be put in perspective. For instance, the agency allows the public to use thousands of miles of roads where the risk of death or injury from collisions of other accidents is far far higher than the risk of being hit by a falling tree. The agency also allows boating and swimming in dangerous waterbodies, winter camping, mountain climbing, off-road vehicle use, and hunting with dangerous weapons. The agency also promotes dangerous occupations such as logging and firefighting. Furthermore, public use of public lands is skewed toward the summer months, while the extreme weather that tends to cause trees to fall is skewed toward the winter months. If the purpose of this project is to increase public safety please consider all the alternative ways that safety might be enhanced.

There are multiple options for managing safety, (a) manage the physical feature presenting the hazard, or (b) mange public use so that the public is less likely to be subject to the physical hazard. We strongly support retention of large snags while educating the public and managing public use to keep the public out of harms way as much as possible. Truly hazardous trees (i.e., imminent risk of falling in very high use areas) may need to be felled (often leaving a high stump for wildlife) but the boles of such trees should generally be left to provide for wildlife and soil needs.

Under-represented snag habitat should be retained on along low standard roads because the PNW Region of the Forest Service already distributes an educational brochure titled "Getting Around on National Forest Roads" which says of low standard roads "If you choose to drive these roads, plan to encounter rocks and boulders, road washouts, downed trees and brush encroaching on the roadway. For safety, … carry extra equipment such as axe, shovel, gloves …" See R6-ENG-RG-01-01. The public already expects some inconvenience when driving remote forest roads and would willingly trade some risk of inconvenience and small chance of encountering safety hazards for viable populations of native wildlife.

The agencies' field guide for danger tree identification indicates that little-used logging roads are a low priority for danger tree removal because of intermittent and infrequent hazard exposure.
There are many miles of roads that may have danger trees adjacent to them. It is not possible to correct the danger tree problem immediately, so it is necessary to prioritize the danger tree treatment workload. The treatment priority should be highest where people are most likely to be impacted by danger trees. Consideration of exposure level and traffic frequency provides a way to prioritize the workload.
…
Another aspect of exposure along roads is traffic frequency. Roads that have a higher traffic frequency expose more people to a danger tree than roads with a lower traffic frequency.
The longer people are exposed to a tree, the more opportunity there is for the failed tree to impact them. If exposure duration and traffic frequency are reduced, the opportunity for the tree to impact people is also reduced. The qualified person should consider traffic frequency and exposure duration when determining whether a tree posses a danger to people.
Toupin, Filip, Erkert & Barger. 2008. Field Guide for Danger Tree Identification and Response. USDA FS, USDI BLM, Oregon OSHA. http://www.blm.gov/or/districts/medford/plans/files/fieldguidedangertree.pdf

The NEPA analysis needs to acknowledge that the public assumes certain risk when recreating on public lands, so not every hazardous tree on every dead end spur road needs to be felled and removed. See ORS §§ 105.672(3), 105.682(1) and Brewer v. ODFW, 2 P.3d 418, 167 Or.App. 173. http://www.publications.ojd.state.or.us/A103245.htm.

Sincerely,
/s/

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Oregon Wild's mission is to protect and restore Oregon's wildlands, wildlife, and waters as an enduring legacy for future generations.