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First name: Roberta

Last name: Vandehey

Organization:

Title:

Comments: A steamrolled project to strip mine our forest as a categorical exclusion

West End Farm Bill CE Project (West End)

#### COMMENT

This project only came to my attention on Wednesday November 6, 2019 at a Wheeler County Court meeting when Commissioner Shaffer briefly mentioned it at after the business agenda items were completed with no explanation of what it was about. He asked the commissioners to sign on to it, which they made a motion to do. It seemed strange that no discussion was had on it between the three commissioners before agreeing to it. It was like it was something that he and Judge Morley had discussed outside of the meeting. Immediately after the meeting when I requested information on it, I was told that I had to go to the clerk's office, fill out a request for public information form, pay for that and wait for a response. When I asked the third commissioner, commissioner Ordway what it was about, he did not know, but had also voted to approve it.

This was a red flag for me because it clearly appeared that it was something that Brandon Houck the next morning and learned that it was a project to finish logging our the

West End of the Umatilla National Forest. This following the devastating Wheeler Point Fire that totally destroyed nearly all of the 54,000 acres of remaining forest area on the South side of the Wheeler Point Ridge followed by the disgusting, devastating and irresponsible logging two years ago in the Kahler Basin Dry Forest (logging) Project of the last remaining old growth stand that survived that fire! And that on top of the ones that they logged within the fire perimeter in violation of the final project determination to stay outside! So I could pretty well guess that they did not want us to know that they intended to continue finishing off our last forest and turn it into grazing land. Like they did by not replanting after the Wheeler Point Fire. A second violation of the determination made in Kahler basin Dry Forest Project to replant "up to" 5,000 acres! Wow, "UP TO" AND THEY CAN'T EVEN MANAGE THAT! And now have the nerve to sneak in again to finish logging it all out, with no regard for the irreparable damage they have already caused the West End (our part!) of our Umatilla National Forest. Why would Heppner District care? They will get all of the jobs while all Wheeler County gets are dried up creeks, increased damage from fires, disease and insect, blow downs, weeds, habitat and wildlife loss, on top of the irreparable damages that their mismanagement of our forest has already caused us. If, as usual you award yourselves this project like I am sure you will, you will only exacerbate criminal damages from two other previous grievous attacks against our West End Forest. Heppner should not be "managing our end of the Forest. They just blood suck us for their own benefits.

This is very much like Heppner's plopping their OHV park right on the boundaries of Grant and Wheeler Counties, as far away from them as possible. Again, all we get are those insidious machines, wildlife disruption, law enforcement, fire (20 or 3 so far) and other damage expenses from which we get no income. Again. Heppner benefits from our Bull Prairie lake and campground, which has nearly burned up 2 or 3 times in the last two years as a result of Umatilla National Forest's again irresponsible logging of that area. Wheeler and Grant County get the flack! Thanks again Heppner! This is a bad habit that needs to stop! Our Wheeler County Court has to start paying attention and require fair treatment for our Wheeler County Tax payers by the USFS!

Sadly it's too late to replace the trees, the steelhead streams, animals, peaceful recreational value of OUR BEAUTIFUL WEST END UMATILLA NATONAL FOREST. Families who I have met up there have been appalled that it is just filthy manure covered grazing land. They cannot stay here. They ask "where are our beautiful trees, hiking trails, established camp grounds, birds for bird watching, animals to watch and photograph, nature walks etc. like other national forests have?

The nation's tax payers pay for National Forest use for their families, not just hunters and loggers and noisy 4 wheelers on roads over every square inch of the desecrated land. They have to kick away the cow manure and human feces and garbage to camp in our National Forest, where the only camping is allowed wherever along the roads, cutting trees to access where they want to be. They can start fires, throw garbage, shit everywhere, leave dead animal parts all over, trespass and poach on my private land, and anything else they choose to do to us with no assistance from Heppner to stop them. Its no skin off their teeth!

Rather than shoving one more irresponsible, unpreventable timber sale (the last before all timber is gone for 6 generations, you need to give us back what other National Forests have and what the tax payers are paying you to preserve. We in Wheeler County, like all other Tax Payers in this was, but no longer is, democratic country are paying your salaries. You work for us, not for lobbyists and a dictatorial president.

It will take 200 years to replace what you have stolen from us like greedy pigs. Having you as neighbors and taking up land in our county, but being run by Heppner is costing our county a lot of money we cannot afford, with no long-term benefit to us. As an example, law enforcement: I was told by the Heppner Ranger to call our own sheriff to stop harassment and threats against me by their hunters. I was even told by hunters that were camped in the middle of the 050 Rd, blocking other hunters from using it, that I had to stay on my own land, had no right to be on the National Forest and blocked me from entering my own property! I called the Heppner ranger at the time and was told me to fix it myself. I had to call our sheriff to stop them from blocking a Forest Service Road!!!! That had gone on for many years and the Forest Service let it happen! You make a horrible neighbor and seem to forget that that land belongs to me, not to you. I do not count except to pay your bills!

And now, after all of this insult, you have elected to not even inform me of yet another disastrous, unprofessional, illegally notification and information deficient Timber theft project. Your failure to invite only two loggers and one other individual to your field trip clearly stacked the deck. And coincidentally one of those loggers is from Heppner, with no personal skin in Wheeler County's rather than Heppner's Though my property is adjacent to this and to the previous timber-trashing projects I was not informed until I almost heard about it one business day before the deadline at the Wheeler County court meeting. was not fully invited to the field trip and was in fact it clearly appeared that the information was deliberately withheld from the third commissioner and was hidden by the two other commissioners from the public in the public meeting on Nov. 6.

Having received only the scoping letter Posthumously, a day late and a dollar short and with no other information or maps made available, my comment assumes a total lack of any other details upon which I was meant to comment. My understanding is that there is no additional information available to the public. Such information, if it exists, could only have been obtained at a field trip less than a mile from my place knowledge of which was limited to those receiving the scoping letter that I did not receive. "Collaboration Opportunity" was restricted to only a second public offering. According to the scooping letter, if we got it, there was a "pubic workshop", the time of which was omitted from the scooping letter.

Failing to receive this scoping letter by mail, District Ranger Houck told me that this project was published in Heppner's "newspaper of record". Problem is, that newspaper is one in Pendleton that serves (guess who) Heppner, not us! Obviously, if notification was meant to inform those that are damaged by this product, it would be published in the Times Journal, our "Newspaper of Record"!

This scoping letter of a Categorical Exclusion is so notification and information deficientis so unprofessional and general by design, that it is hardly worth our time addressing it. Given this, I will respond in kind, unprofessionally. In the past, I have tried to respect these projects while not approving of them, but this one does not deserve that respect. With these restrictions, the following are some of the information that I see is omitted in an attempt to steamroller this disastrous, smoke-screened Project proposal past us.

I understand why you needed to propose this steamrollered project to strip mine our forest as a categorical exclusion for the simple reason that it could never stand up to "further analysis and documentation under Section 603 of the Healthy Forest Restoration Act (HFRA) (16USC 65916)". Your claim that "the project is needed to reduce the risk and extent of the current insect and disease infestation" is a crock and that explains why you produced no proof of that claim because such conditions do not exist in this totally healthy forest which has thank God had limited to no intrusion into it by others such as you! You can't produce proof of what does not exist.

1. There is no description of what the sites look like before your logging, etc.
2. There is no description of what the sites will look like after your logging, etc.
3. There is no detailed list of the insects that were verified to be present and specifically where.
4. There is no detailed description of how said insects were verified to be present and verified to be a problem in need of treatment.
5. There is no detailed description of how the insects will be treated for control
6. There is no detailed listing of the diseases verified to be present and specifically where
7. There is no detailed report on how these purported diseases were identified
8. There is no detailed report on said diseases were verified to be present and verified to be in need of treatment.
9. There is no detailed description of how those diseases will be treated
10. There is no reference at all to the need to study the impacts of your destructive activities will have on wildlife
11. There is no reference at all of the need to address the ill affects that your destructive activities will have on the recovery of the contiguous Wheeler Point Fire area.
12. There is no reference at all of the need to study the negative impacts your logging, burning, etc. will have on the 3 year old scourge left behind by the contiguous Kahler Basin Dry Forest Project logging area located to the south of what you now plan to destroy as you did in that one.

Now I will tell you why and how what your claim that what you will do will not make it better than you claim is wrong now, but rather will make it worse. Your project will totally destroy what is left of our healthy forest for at least 200 years: and that is if it does not burn again. I will tell you why what you are doing will actually cause it to burn and to have disease and insects that are not by any means verified in your project proposal to verifiably exist in the land that you intend to now destroy with your proposal. These problems that you claim to exist to justify what you want to do in fact verifiably do not exist in these stands! And I will tell you why I know that.

If you have it your way as you intend to have it, here is what you will do to us and to our last remaining trees in the West End Forest:

1. Fire: thinning healthy stand of previously untouched trees opens it up to wind and sunlight, higher relative humidity with reduced shade, dryer fuel index, increased ladder fuel under storage growth, less moisture retention afforded by shade and wind restriction, loss of large trees that act as nature's "lightning Rods" that capture lightning strikes and holds the fire in their tops until discovered and extinguished before it spreads to under storage latter fuel that is not there due to the lack of sunlight reaching the ground (shade) below.

1. Insects: human disturbance of a stand invites insects into the stressed area. Those opportunist little bugs quickly "smell" a new "habitat" that human activities have given to them. They happily move in and thank you very much!

2. Disease: Any disturbance of a stable forest stand opens up the stressed remaining weakened trees to not only blow over, insects, and fire, but also to disease. These problems then spread to healthy stands if any remain

which they do not on USFS West End forest. When you are finished. Those afflictions will now move into my 1500 adjacent Pokey Pine Timber Farm's healthy, vibrant 20 year old multi-specie plantation. This entire property and the three streams on it were completely replanted and restored after the Wheeler Point Fire. Again, thanks for sharing the insect, disease and fire afflictions of your lousy short-term timber mismanagement practices (cut it all now regardless of subsequent damage across the board, future timber production perspectives, including mine)! Again, thanks so much!

3. Total destruction and collapse of our stable, healthy, balanced and vibrant Ecosystem: this results from your total ignorance and exclusion of concerns for the impacts on the climate, the animals, the plants and their chain of destruction due to their interdependence on each other. This interdependence also involves the human need for this mutual dependence on our heretofore-balanced ecosystem (before the USFS Timber thefts came along). You kill off one; you kill off all of us.

4. The USFS's motto apparently is why not log today, what you could sustainably log continuously over the next 200 years at an increasingly higher value. Timber is increasingly a limited commodity in our climate- changed world, so its value is going to inestimably become that much higher and you are depriving the next 6 generation of children of that future. If you were concerned about nothing else, at least you should consider the tax payers (me?) that pay your bills, you would adapt better business practices for not only the trees, the ecosystem, the environment and climate, but for your tax payers for whom you work.

5. Total disrespect for your neighbors and their (my) rights:

1.

- \* You poison dry up and poison my drinking water. and dry it up.

- \* Your hunters trespass and poach on my property and you refuse to help stop that

- \* Your hunters threaten while holding fire arms

- \* Your hunters block me from accessing my own property using the 025 Road and you refuse help me

- \* Your hunters block the public's use of your forest 025 road and you allow it to continue for 5 years until our own county law enforcement had to clear them out

- \* Your cows trespass on my graze excluded property (required by law due to CRP Grants funded for Wheeler Point Fire forest and stream restoration following the Wheeler Point Fire) and you refuse to repair the fence saying that you will only repair fences in the spring and they refused any later maintenance after the fence appeared to have been deliberately removed to allow entry to your cows to graze my property.

- \* You exclude me from notification of a timber sale that will damage my property. I had to hear about it at the last minute with an obtuse "notification" whispered at a county court meeting.

- \* You refused to grant a single request in the Kahler Basin Dry Forest Timber Sale and harvest. And in fact, you threatened me in ways that subtly resembled retribution to my comments on that sale.

- \* Now not only do I have to keep your cows and hunters out of my land, I have to keep your fires, diseases, insects out also. I fear that will be impossible if you continue your unbelievable "strip mining" of the adjoining forest as this latest project proposes to do!

[middot] And what an insult to Wheeler County that you destroy a precious asset that could bring long term jobs to this county rather than to Heppner. To clear-cut a marginal timber unit just to send the trees to Heppner where they will build a biofuel plant. You kind of forget and hope we do also, that this logging is being done in Wheeler County! How about us??? That's right, we don't need jobs. Thanks again for that too!

[middot] And finally, the scoping letter proudly states that "tree planting may be considered where stands are understocked". I hate to rain on your parade, but Oregon State law requires the planting of understocked logged stands. Hopefully you adhere to state laws like this one when you are logging in that state.

## WHY WE CANNOT TRUST USFS

\* Kahler Basin Dry Forest violations:

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1. Road Closures not closed: 2 had gates installed as required have remained locked open during the 2 years since that logging project ended.
2. Replanting of 5,000 acres left unplanted at this time in the west end of the Wheeler Point Fire perimeter where it was supposed to be.
3. Prohibition of Cutting of any trees within the Wheeler Point Fire perimeter: All large (surviving seed trees) were illegally clear cut 100 feet out from both sides of the 025 Road through the entire distance of the Wheeler Point Fire area.
4. No New Roads were to be built; Illegal Roads were built all over the previously roadless area north of my north boundary. In so doing, the logging destroyed all of the headwater spring sources for all 3 branches of Alder Creek, formerly a vibrant, healthy and State-protected steelhead stream! That water is also my sole source of domestic water, AKA My Drinking Water!
5. Debris was to be mulched back into the soil to assist in reestablishment of a healthy growing site, reduce erosion, moisture retention and aesthetic value for forest use, etc. The huge piles are still there two years later. Burning them poses an extreme fire danger. Also that will cause atmospheric damage (Releases carbon , CO2 into the atmosphere, causing our climate change and smoke that poses serious health threats (asthma and more). Additionally birds (quail and ?) and other denning critters that have taken up residence in the piles are killed when the mega piles are burned. These huge piles testify to the fact that the debris was not mulched back into the soil and therefore that is one more violation of the Project's "claim to Fame" (infamy?)!!!
6. Commercial logging of Fairview Campground: After the post "Settlement Agreement" with Blue Mountain Biodiversity that there would be No commercial logging at the Fairview Campground location, it was illegally commercially logged

## HOW I KNOW

I own and operate the approximately 1500 acre Pokey Pine Sustainable Timber Farm in Wheeler County. Borders on the north and the East of West End Umatilla National Forest. I have lived her and managed this property for 49 years. It has been managed as a exclusive sustainable yield timber farm. This property totally burned out in about 1968 in the Snow Basin Fire and again in 1997 in the logger-caused Wheeler Point Fire. I restored this property after both fires.

I was born and raised on a sustainable timber farm in the Coast Range. I learned the effectiveness and success of selective logging to maintain healthy timber production, as well as the economic benefit that resulted from that type of management. Having moved here to the eastside, it soon became clear that the reforestation process would not allow clear-cutting if the forest were to ever recover and be productive again. And that was before the increasingly warmer and drier climate.

Following the Wheeler Point Fire, boring 15 to 18 inch DBH burned trees revealed that they could be as old as nearly 150 years old. It was clear that this growing site cannot be clear-cut with any hope of ever logging it again. Now the Umatilla National Forest to our north is in the same boat. There is basically no difference with the land use change and climate change. Disturbing the stands such as with fire or clear cutting would only make it that much unlikely that this land could ever again be timber producing ground. And that was even before climate change has hit us.

Based upon my experience, which is considerable, your claims that thinning and opening up a well established stand will decrease the likelihood of its burning. You are dead wrong and the proof is here on my property and surrounding ownerships after the Wheeler Point Fire. A Forester graduate from OSU asked me if he could study fire behavior on my property for a research paper he was writing. I said of course and he assured me that I could have a copy when it was completed. He discussed his findings with me after documenting his finding on other W.P. Fire burned land.

He confirmed what I had already noticed that on my own and on the surrounding burned lands. The worst burnouts were where it had been logged or thinned. When the fire came to untouched thick or large old growth stands, it burned around it due to the higher humidity within the stand, the wind couldn't just blast through like it could through a thinned or logged area and there was no ground fuel to sustain it. The thinned stands and logged areas were hotter, dryer, had lower humidity, allowed the wind to sweep through unimpeded, and had more ground ladder fuel, so they just exploded, taking trees with it. Inarguably grass was a major fuel factor in the fire, so having no under storage growth, the thick or large old growth stands survived just fine. The thinned stands or logged areas offered up deadly grass to cause the fire to literally explode, taking the sparsely spaced trees with it.

Interestingly, when that paper was submitted to the OSU School of Forestry, predictably, they could not edit it enough to fit what the established forest industry required it say to maintain the Smoke and Mirror fairytale that they peddle to protect getting paid for what they are doing at the price of losing our timber permanently along with all that hangs by a thread to survive on this earth as we know it. Needless to say, that research paper will never hit the press.

There is no moral excuse for this when now we know that every tree you cut or burn releases its stored Carbon into the atmosphere to cause the climate change that is going to kill us all. And for what? Just short-term money in your pockets? Shame on you! Your literal Smoke Screen policy of hiding the truth just to protect the slash and burn status quo to keep getting rich will ultimately turn into an actual smoke screen when once more we burn up. No concern is given for the criminal aspect of lying.

After two fires, I personally have had enough of your fairytale, smoke and mirrors lying and your hiding behind a

smoke screen as you cause more fires by claiming that you are preventing fires and creating healthy forests by logging and by treating insects and diseases that are not there. How stupid do you think we are.

Common sense is your worst enemy! What you are actually doing is damaging our forests so there will be more money made by returning to log or burn some more until the last tree is gone and you can then please the cattlemen's lobbyists and the USFS can change its name and job. I hope the manure market will meet your monetary needs.

When we bought this place in 1971 we regularly had 5 feet of snow at 3100 ft elevation. Now we get no more than a foot briefly and sometimes not even that. Snow accumulations on the Snowboard and Wheeler Point Ridge were well in excess of 15 to 20 feet. Last year there were only a few feet in some locations and in the past since the Dry Forest logging it is gone by February with our spring runoff finished in March rather than in May. Temperatures just since the Wheeler Point Fire were on average 20 degrees warmer with extreme winter temperature inversions have become the new normal. Needless to say, the records will also reflect the changes resulting from the Kahler Basin Dry Forest \* Timber Sale. I have been a NOAA Weather Station and spotter for the past 24+ years and have maintained printed records. My reports are also on file with the NOAA Weather Service.

There were no roads on Kinzua and USFS property up to and beyond Snowboard and Wheeler Point Ridge to our north. My husband was the forester for Kinzua Corporation and did a lot of walking where there were no roads. It was all old growth fir and pine. Fir stump holes on our property after the Snow Basin fire were easily 50 and 60 inch DBH. Umatilla Forest had no roads up there and all the timber was old growth even larger than what was on our property.

This is how I know

Now at this time, I ask that you take a look at my property as an example of good timber land management as opposed to bad management just on the other side of the fence. I invite you to join me on a field trip to the 025 road on the south side of Wheeler Point overlooking my property immediately to the south of the 050 Road. Many folks have done this with me and it has been quite an eye opening experience for to see what the USFS is destroying our public land as compared to the adjacent private land post Wheeler Point Fire. They say that the government should be ashamed to treat our land that way.

I look forward to your visit to discuss forest management while comparing my property with West End Umatilla Forest's Management.

CONCLUSION

Clearly this project you label as a "Categorical Exclusion", disallowing us to object to your omnipotent, self-serving decisions proves that you know you are guilty of all that this comment include. You obviously already have your mind made up and nothing we say will change anything. These comments are a useless waste of our time, because you overlooked inviting me on your field trip, and have not even sent me the large scale maps that I requested last Thursday, I am determined to comment on your cockamamie self serving project.