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Organization: Blue Mountains Biodiversity Project
Title:
Comments: This is a transcribed copied letter from Karen Coulter, received July 25, 2022. This letter is transcribed as written. No attempt was made to correct spelling, capitalization, or grammar.

From: Karen Coulter, Director,

Blue Mountains Biodiversity Project

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Attn: July 19th, 2022

To: Alison Arnold, *Please send us a large

Pomeroy Ranger District scale version of the draft

71 West Main St. Proposed Action Map, with

Pomeroy, WA 99347 topographic lines and all roads and road numbers.

Comments on the proposed Sunflower Insect & Disease CE Project

Re: the Purpose and Need statement for the Sunflower Insect and Disease CE timber sale "project": Commercial logging is not needed or effective to reduce the effects of insect and disease infestations. What is meant by "mitigating" the effects of insects and disease? The most effective method to reduce any excess density of trees causing inter-tree competition stress for nutrients, sunlight, or water is non-commercial size small tree thinnings and/or the use of prescribed fire to mitigate the effects (or reduce them) of insects that defoliate trees or tree diseases, as most density is caused by only small tree encroachment from wildfire suppression or re-growth after past logging removal of most all the overstory. Due to the past history of clear cutting and overstory removal, the only unnatural or "excess" tress density is likely to be small, young trees, not mature trees targeted for commercial logging. It is questionable whether commercial logging makes much difference in making forest area- especially moist mixed conifer or high elevation mixed conifer- more resilient to fire disturbance through the

reduction of biomass (aka "hazardous fuels) as the main drivers of intense fires, the spread of extensive fires, and the frequency of stand replacement fires are low humidity, high ambient temperature, and high windspeeds,

not the extent or depth of biomass. "Crown bulk density" is the least relevant parameter for fire severity, extent, or frequency, yet reduction of the crowns is used as a rationale for commercial logging to reduce fire effects. Logging to theoretically increase forest resiliency to fire is especially pointless and ineffective for higher elevation, moister mixed conifer which naturally grows more densely due to higher moisture retention (especially from longer snowpack retention and higher rainfall, as occurred this spring) and given its natural cycles of less frequent stand replacement wild fire. Logging mature and large trees (including Grandfir between 21-30" dbh) removes the most fire resistant tree size classes and results in drier stands with far more flammable slash and increased wind speeds through stands, all of which increases fire intensity and extent, and resulting public hazard. Reintroducing fire where appropriate (in drier forest types) make, far more sense than commercial logging, to break the cycle of artificial induced dense small tree in-growth, which results from logging off overstory and/or midstory canopy trees. Further, logging is known to spread mistletoe and root disease, not reduce tree disease incidence or severity.

p.3 see the book, Nature's Phoenix by Chad Hansen and Dominick Della Sala, both Ph. D. scientists, and their other articles regarding the interaction of wildfire, forest management, and climate change, which can be found on websites at the GeoInstitute, the JohnMuirProject, The FUSEE, a Firefighters Association. Climate change also presents most biomass ("fuel") reduction from being effective, given the greater, virtually unstoppable intensity of fires associated with extreme climate change. Given that there are likely to be more severe fires driven by climate change-associated droughts, high temperatures (heat waves) and higher storm and wind intensity, the priority should be to protect as much natural forest carbon sequestration and storage to be retained as possible by not continuing to log mature and large trees, in order to reduce or slow extreme climate change effects. A "need to sustain local economies, including local forest product industries, by suppling forest products" is not a legitimate purpose or need for an Insect and Disease CE project and is an outdated goal, given the imperative of redirecting or slowing global warming effects and the economic losses incurred by the timber industry and the federal treasury now from timber sales due to the small average tree sizes due to past over-logging and current unsustainably fast logging rotations of only 30 years or less since the last timber sale in the same area. Reducing the densities and altering tree species compositions to more p. 4 closely resemble their historic range of variability is also not a justifiable purpose or need under an Insect and Disease CE, and is an over-used, outdated rationale for standard timber sales that generally results in homogenizing the forest and making it more vulnerable to fire, insects, and disease by converting diverse forest species compositions to only one or two tree species preferred by the timber industry. We see proposed management actions of commercial logging as inconsistent with best available science and contrary to the stated needs for the timber sale "project" to make the area more resilient to fire, insects and disease.

Re: Existing condition:

The Sunflower project area is no longer in the midst of prolonged drought conditions, as we just experienced an exceptionally late snowpack and unusually moist/wet spring conducive to a profusion of healthy plant and tree growth and more moisture retention in soils, rivers, and streams. Interestingly, there are far more sale units than areas of insect outbreaks mapped on the "Aerial Tree Damage Survey Map" included in the scoping package. The proposed sale units are not aligned with or limited to the insect outbreaks. There is no consideration of elevation, slope aspect, or soil types and riparian area proximity in areas chosen for sale units that could cause these areas to naturally have a predominance of "late seral, shade tolerant" tree species, such as Grand fir and Douglas fir p.5 We are apposed to logging out most mature and/or large Grand firs, Douglas firs, Englemann spruce, subalpine fir, and other shade tolerant tree species (or moisture- dependent tree species) and replacing them with timber industry preferred Ponderosa pine and Western larch- especially when Ponderosa pine and larch were not the dominant tree species due to ash soils, high elevation, Northern slope aspects, or proximity to riparian areas. We ask that the Forest Service refrain logging any trees, including Grand fir, that are [ge] 21" dbh. We also request that there be no clear cutting or virtual clearcutting (such as "seed tree" "shelterwood"; "sanitation cut" or "Improvement cut") such as we saw across all the south George logged commercial sale units, which we recently visited and documented with photos. There should be no logging down to very low basal areas

such as 20-70 ba/acre. Openings should only be created in existing historically dry Ponderosa pine-dominated sites, and those should be restricted to no more than 1 acre, expanding on natural openings. Lack of recurring fire on the landscape due to wildfire suppression is due to Forest Service involvement in wildfire suppression as much as anyone else's responsibility. Further, it is questionable if the project area is lacking recurring fire, given the recurring recent fires in the sunrise sale, the Turkey Tail sale are, and the Pomeroy "Danger Tree and Fire Salvage" Sale planned, as well as in the adjacent Wenaha Tucannon Wilderness Area. This is hardly a landscape lacking wildfire disturbance. This reality also indicates the inconsistency between planned management actions and the stated purpose and need for the project, and this timber sale being done under an Insect, Disease, and "fuel" reduction CE. Re: the Proposed Action: We ask that the Forest Service confine the proposed management action to small tree non-commercial thinning, and where the stands were historically, and are currently, Ponderosa pine, and/or Douglas fir dominant, with few other tree species, to prescribed fire. These methods would accomplish the purpose and need goals for the project. We support the existing level of planned non-commercial thinning up to 9" dbh only, by hand only, if small tree density really warrants this, but ask that all planned commercial logging be dropped, converted to non-commercial thinning and/or prescribed burning, or be confined to young, dense populations. We request that the Forest Service make no exceptions to thinning from below, not just for "most" stands, and that the largest size class of trees in the stands that are abundant be retained-not just 21" dbh+ but also 15-21" dbh. We support and request retaining the full diversity of tree species present, with emphasis on retaining seedlings, saplings, and mature trees of species removed from natural tree species compositions in past timber sales. We are opposed to all logging on steep slopes >170. Drop all steep slope logging, which is also unlikely to be unlikely to be uneconomical as well as ecologically destructive. P.7 For slash management we favor prescribed burning on dry forest sites or lop and scatter, with mastication only next to major access roads.

Drop most non-commercial management in RHCAs, as these are naturally moister, more productive, and denser forest environments. We are strongly opposed to any commercial logging or mature tree felling in RHCAs or any undeveloped lands. We are opposed to tree planting, and request that this be dropped. We are also strongly opposed to so-called "Temporary" road building, as "temporary" roads are rarely fully decommissioned and are often re-used, perpetuating the long-term ecological destruction of roads, including forest fragmentation, increased sedimentation of streams, and increased assess for illegal firewood cutting, ATV disturbance, fur trapping, and the introduction and dispersal of invasive exotic plants. Please drop all 8 miles of proposed "temporary" roads, which also seems excessive for a CE authority.

We are concerned that CEs bypass NEPA process and consideration of wildlife habitat needs. Please don't log any suitable habitat for Pileated Woodpecker, American Marten, Pacific Fisher, Northern Three-toed Woodpecker, Lewis' Woodpecker, and other Sensitive, Threatened, or declining wildlife species. Thank you for consideration of our comments.

For the wild, Karen Coulter