

Data Submitted (UTC 11): 10/19/2022 4:03:53 AM

First name: Milo

Last name: Mecham

Organization:

Title:

Comments: I am submitting comments to the Sweet Home Ranger District's proposed 2022 Roadside Hazardous Fuels Reduction Project. While I do not object to appropriate management of the Forest, I question the logic behind this proposed action, and thus I do have some questions about the need for this action.

As an introductory matter, the draft decision letter states that aggressive fire suppression in the past has created an increased hazard of wildfires in the Middle Santiam Wilderness, and then concludes that the Roadside Hazardous Fuels Reduction project is necessary. Later in the draft decision letter, it is explained that the "intent of the planned fuel breaks is to reduce the fireline intensity along these roads, allowing for aggressive fire suppression actions and reducing the risk of uncharacteristic wildfire on Federal land."

If past aggressive fire suppression has created a problem, then it hardly makes sense to continue to facilitate aggressive fire suppression. The fact that the Forest Service has engaged in a collaborative effort along with State and private landowners in the area sounds good, but if this collaborative effort has only resulted in more plans and actions that contribute to the problem creating extraordinary wildfire hazards, then the collaborative efforts have been a waste of time. It seems you would better spend time developing alternatives to aggressive fire suppression, so that you can get out of the vicious circle that you seem to be perpetuating.

What you are proposing is to create firebreaks along these roads, on the assumption that if a fire starts downwind of these fire breaks, crews can be rushed in to stop the fire at these roads. I suppose that there is some logic in this, but I am concerned that this is actually just a disguised plan to increase the harvest coming out of Sweet Home Ranger District without having to go through the ordinarily required review and justification for a harvest. It is good that you are leaving all trees larger than 17 inches, but what is the rationale for this size? A 16 inch tree is fairly large, as is a 15 and a 14 and so forth. I acknowledge that small, crowded trees create the conditions most conducive to crown fires that then combust even large trees, but why could you not save decent sized trees of slightly smaller than 17 inches if you treated them properly by thinning, rather than cutting them down willy-nilly?

What you will be creating, aside from a theoretical fire break, is a semi-desert that will create barriers for most invertebrates and many small mammals. Removing all small trees and all woody debris under ten inches is going to create an area that severely discourages if not precludes movement of small species. This and other impacts do not deserve to be dismissed through a categorical exclusion.

I would encourage you to hold off on this project until you can develop appropriate standards and a more logically consistent rationale for the cut; one that will guide the type of cut that is actually appropriate. An anecdotal review of the 2020 fires suggests that the greatest spread was on previously clearcut areas where crowded plantations allowed the fires to crown and spread rapidly. These fires eventually stopped when the winds died down and the rains came. Having more firebreaks might have helped, but also they might not. The standards that you should develop should look at what conditions made the fires worse, not just select an arbitrary 17 inches. Seventeen inch trees are an important asset that should be preserved, but the harvest size limit should be tied to some scientifically based reason, not selected because big trees are harder to deal with.