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Organization: Eco Advocates NW - League of Wilderness Defenders
Title: Director
Comments: Please accept these scoping comments on the Cedar-Gales Roadside Risk Reduction project.

First off, I would request that a scoping deadline for this proposal be set in mid January 2023 because your offices are closed as of December 16 and thus the public can not contact any Forest Service personnel to make inquires on these proposals before the December 19, 2022 scoping comment deadline. In addition, during the December holidays will Forest Service personnel have the time to truly assess the scoping comments and incorporate them into modifying the proposal or is the whole public participation process just a meaningless formality to barely meet NEPA guidelines?

My background is that of former biological technician with the Umpqua National Forest from 1990 - 1991 and Eugene BLM from 1992 -1994. I have also worked as a wildlife surveyor from 2011 to 2015. I have an Associate degree in Forestry. I have worked nearly full time unpaid for those 30 years to reform Forest Service forest ecosystem management policy through all means available including creating public controversy through non violent civil disobedience.

Also, since 1991 I have worked vigorously and tirelessly to protect the ecological integrity of many inventoried and un - inventoried roadless wild areas in the Middle Fork District to which the Cedar Creek fire burned especially the 9,000 acre Corn patch RA, the 7,000 acre Fuji Mt - Mt David Douglas, the 30,000 acre Maiden Peak RA, and 4,000 acre Blair Mt - Koch Ridge areas.

The Willamette National Forest should set a size and age limit for trees to be felled and/or removed within 300 feet of the proposed 70 miles of logging roads inside the Cedar Creek Fire perimeter and the 20 miles of forest roads inside the Gales Creek fire area perimeter. All trees greater than 30 inches in diameter at breast height (DBH) and /or trees greater than 100 years old should remain on site to provide soil stability, water storage and filtration (hydrologic function) as well as erosion control for hundreds - if not thousands - of years into the future on the 2600 acres proposed. In addition, these thousands of large snags and downed logs should remain onsite to create large woody barriers to slow future wild fires, create wildlife habitat for hundreds of species over their life as well as store vast amounts carbon in the logs themselves as well as the creation of soils for hundreds of years into the future.

Only leaving 7 to 10 large downed trees per acre across an area of approximately 2,600 acres under the Cedar-Gales Creek Risk Reduction Project as was stated by the Middle Fork District Ranger and Middle Fork District Hydrologist at a public meeting in Oakridge on Thursday December 15, 2022 without any size specification or size limit of trees to be removed provides no safeguards to assure the most ecological and hydrological significant standing snags and large downed logs over 30 inches DBH can fulfill their functions for hundreds of years into the future.

Applying a leave tree size limit of greater than 30 inches in diameter (DBH) would set a clear and verifiable result for agency personnel as well as citizens who might think such "risk reduction" or salvage logging projects like these are simply an excuse for the Forest Service to log and sell the last old growth trees in our national forests.

Also, agency personnel with ecological and hydrological expertise along with road safety engineers should be marking the trees that will be felled. Contractors who will benefit from the felling and removal of the hazard trees less than 30 inches DBH should not be determining the trees to be felled. In that light, the Forest Service should set a minimum snag retention in square feet of basal area per acre for high severity burn areas within 300 feet of roads in stands less than 100 years old.

In the Willamette National Forest proposal it is mentioned that felled trees and resulting down woody debris maybe converted to firewood or biomass fuels or biochar. It seems completely incongruent scientifically and legally indefensible to allow 100 to 500 years old trees and/or trees greater than 30 inches in diameter with many thousands of tons of carbon to be burned as firewood or biomass fuel and thus releasing thousands of tons of carbon. These legacy mature and old growth trees are priceless to the ecosystem, countless species that depend on them, and our over heating climate as well to the stability of the hydrological functions of the watersheds for hundreds if not thousands of years.

Further, the Willamette National Forest and Region 6 must address and assess the impact of felling and removing huge amounts of carbon biomass from the ecosystem by taking dead trees greater than 80 years old. Also the Willamette National Forest must assess the impact of releasing huge amounts of carbon into the atmosphere when such is quickly burned as biomass, firewood, or in slash pile burning. There are also public health impacts when trees are converted to firewood and/or slash and burned within Oakridge and Westfir's local air-shed which is struggling to meet EPA and Oregon DEQ clean air standards all year long.

Also, what is the statistical basis for large snags greater than 30 inches DBH further than 100 feet from Operational Maintenance Class 1 Roads falling on and actually killing a person using said roads over the lifetime of the snag? I would assume snags within 100 feet of a campsite inside an official campground, or "registered" dispersed camp site, a swimming pool parking area, and an official trailhead would have much greater probability of being struck and thus a much more viable case could be made for felling dead trees if it is leaning towards such. Hazard tree removal activities should not occur in rarely-visited places, or places that could reasonably be closed to the public.

Speaking of unnecessary forest roads, many miles of roads should be closed and/or re-contoured. Roads into roadless areas with no trailheads or official facilities should be permanently closed and re-contoured. The Cornpatch RA is one such area where trail heads can be relocated because roads are too costly to maintain and are failing. Forest Roads 378 and 379 off the 5883 road are such. The end of road 2408 should be permanently closed and re-contoured for much of its length. Much of the 2418 should be closed and re-contoured as well as the 294 road off the 2418.

In summary, rather than a one-size-fits-all landscape-level approach to felling and removing dead trees and snags upon sensitive and recovering fire impacted tree dominated biomes, all management should be site-specific, take into account the ecosystem services provided by large and long lived snags and large down logs, and only target dead trees less than 100 years old that truly pose a threat to public safety at campgrounds, trailheads, "dispersed" camp sites, "swimming pool" parking areas and very high use sections of forest roads.
Thank you for these considerations in your planning and decision making process.
Sincerely,
Shannon Wilson
Director Eco Advocates NW
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