Data Submitted (UTC 11): 9/13/2023 4:20:03 PM
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Comments: Kendall Cikanek, Whitman District Ranger, USFS
Wallowa Whitman National Forest
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Re: Clarks Fuels Management Project

Dear Mr Cikanek, and other team members,

I want to thank the folks of the Wallowa-Whitman NF for the open house scoping session held in Halfway on Aug. 10th on the Clarks Vegetation Management Project. There was some good information presented.

However, there were things said that are of significant concern that must be addressed for this project to move forward in a way that will benefit public forest lands and the needs and values of our area as time progresses.

The very first concern that I hope raised the eyebrows of the scientists working for the W-W who were at the open house was the short statement of Supervisor McKinney. It was a sales pitch fraught with less than science-based justifications for the project. That is a poor way to introduce a planned action. The 'desired condition' simply cannot be achieved in these changing climactic conditions. That is what I will address first.

His short statement at the scoping session certainly raised my eyebrows, as what he said is simply not achievable at this point in time, or any time in the foreseeable future. He was all about returning the forest lands to pre-colonial, I think is the term he used, condition. With the climate crisis we face, there is no way that can be achieved. He was all about looking backward, not forward. Yes, we need to understand the past, but with the significant changes we are already facing, and with more coming, we have to address what the future is likely to be in reality. The FS must use the best available data and up-to-date science in order to address the real scenario of what this project entails and whether the proposed action can meet the primary goals as presented without doing more damage than good.

I am also concerned that the good folks working for the FS are comfortable with the continued disregard for the National Environmental Policy Act by doing an EA instead of an EIS. This circumvents the intent of the law, plain and simple. I would hope that W-W would decide that a project of this size and scope sees a full evaluation as the law intended and do an EIS. One important reason would be to fully analyze the cumulative impacts of other activities and projects, including the Morgan Nesbitt proposal.

Various presenters mentioned the very real and very problematic nature of wildfire we face in this changing climate. But the fact is, which was very poorly addressed, that it is not the forest fuel load that is driving fire, but unprecedented climactic conditions of extreme heat and significantly more wind that we have seen in the past.

I am not unfamiliar with forest fires. I worked as a seasonal for the FS for many years including interregional fire crews, a district fireman, on a fire saw crew and a season as the pre-attack person on a crew doing fieldwork for the Selway-Bitterroot natural fire plan. My last fire was in 1988, when there were high-intensity fires in ID, MT, and WY. I have read books on wildland fire and their management, and read many papers, essays and comments on fire science and fire ecology.

To that end, I view most of what was said about fire at the scoping session as very misleading to justify

'vegetation management' of broad swaths of public lands. Most logging, even selective cutting, changes most mature forest areas from mezic (moist) vegetative patterns to xeric (dry) vegetative patterns. In the Sula District of the Bitterroot National Forest where I spent many seasons, I saw thousands of acres - in the name of preventing the repeat of fires like Sleeping Child and Saddle Mountain - heavily over-logged to stop a fire if it burned there. But it failed in its intended purpose when the fires came around 2000 (I can't remember the exact year) in the early years of the high intensity fire scenario we now face.

A friend was doing the GIS mapping each night of the above fire for the management teams to have in the early AM. Since I knew the area very well, I looked at those maps. I poured over a couple weeks worth of those maps. The fire-break areas and the logged areas burned hotter and faster than the un-'managed' forest lands. That speaks volumes. Yet the FS is still promoting the same out-of-date idea that we can slow or prevent high intensity fire by 'vegetation management' logging projects. That area is not a lot different, habitat-type wise, than this south face of the Wallowa's.

More recently, there have been many well publicized high intensity fires that burned uncontrollably through heavily logged areas and through areas that had been thinned and managed as major fire breaks. The classic example is the Camp Fire that burned over Paradise, CA. Others are the Holiday Farm fire and the Bootleg fire here in Oregon. In Montana, the Jocko Lake fire, an area I have spent time in, was similar. There are others that are well documented as to how no amount of logged-over forestland, vegetatively managed areas or even areas with no trees what-so-ever don't even phase these climate-driven fires.

As we know it is not the large trees that burn in even these high intensity fires, but the smaller, flammable fuels, like young trees, shrubs and grasses, which not only are there more of after logging, but those finer fuels are drier after the overstory is removed.

Most wildfires these days are human-caused ignitions and they burn an inordinate amount of forest land, private and public. The vast majority of those ignitions occur in close proximity of roads. The FS already has trouble keeping motorized travel off closed roads on the W-W now.

For fire prevention purposes, better restrictions on human potential for ignitions would do more to protect Pine Valley than this project would. I know that would be a tough sell in Baker County. If this project moves forward, I would suggest that there are more and better road closures that are effective. As an example, I was hiking in the East Pine drainage a week ago on a closed road. A number of years ago, it was impassible because of a double kelly hump, but defiant ORV riders worked their way around the tank trap. Now trucks and SUVs are using it as the kelly humps have been planed down. How many other roads are like that?

When a road density analysis is done for this project, it must include all roads in the area, including those that are (supposed to be) closed. This is an important factor in improving wildlife habitat and security cover.

The other indisputable fact of fire in this new climate scenario is that to keep homes and buildings from burning in a wildfire, the most effective way is to engage in sound fire-wise property management on the part of the homeowners. We do it. Many of our neighbors do it. But far too many people depend on the word of the FS or state that they are going to protect their property.

I have looked at many aerial photos and videos of residential areas burned over by wildfire. Because homes and other buildings are more flammable than the vegetation, the fire intensifies and starts burning home to home. The first place I saw that was the Tahoe fire some twenty or so years ago. Many fires since have shown that same pattern.

As the project emphasizes the protection of private lands and resources from fire, the FS would do better to engage the private landowners in a cooperative effort to create the accepted and logical steps of fire safe zones

around homes and other structures, and to modify the homes to meet good standards for withstanding wildfire. Logging tens of thousands of acres just ain't gonna do even a fraction of what fire-wise planning would.

My other main concern about this project is the needs and values of wildlife and good habitat. I mentioned roads above, and any road creates a fragmentation of wildlife habitat. There are many studies and papers out there that address that problem. As I noted above, as well, even so-called closed roads are being used at a level significantly beyond the intent of what management documents say they are. More roads, open and closed (sic) means less elk. Statistics show that. Any work on road density must include all roads on adjacent private lands and non-FS public land.

Wildlife corridors are extremely important, in this day and age of heavily fragmented habitat, and this project will impact possibly the most important migration corridor in the Wallowa's. That is just plain bad management to propose anything that could have a negative impact on wildlife. The impacts of human encroachment over the last hundred years or so has had a major impact on disrupting wildlife migration, birthing grounds, security cover and thermal cover for both heat and cold.

The FS does not have a good track record over the last 40-50 years in addressing this problem. Again, this is why doing a full EIS would be important. Cumulative impacts of other activities must be addressed, both on public and private lands.

I appreciate the ideas of the FS biologists I spoke with about stream restoration. But there are better ways to achieve it than heavy manipulation. Roads and sedimentation from land disturbance are probably the greatest impact to a healthy fishery from my experience. As has been documented, the reintroduction of beaver back into the streams greatly improves habitat. In a study in Idaho I just read about, areas where beaver have been brought back are proving to be very effective fire breaks as well. An analysis of this should be included in this project as an option for riparian management.

As you develop this proposal, I would strongly suggest a No Action alternative that would focus on the more effective and less impactive methods of addressing wildfire preparedness. As presented, this is nothing more than a glorified logging program.

I trust my comments will be carefully addressed as the FS moves forward.

Thank you.