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Shaniko Cowie, Project Lead
Wallowa-Whitman Supervisors Office
1550 Dewey Ave., Suite A
Baker City, OR 97814

re: West Wall Defensible Fuel Profile Zone (DFPZ) project

Dear Ms Cowie and WWNF Management Team,

I am more than a bit disappointed in the way the WWNF has gone about preparing and presenting the West Wall project. The scoping letter may have been a good first draft, but to use it as the actual presentation to the public and partners is somewhat puzzling to me. You must know it is a poor presentation. But the fact that the WWNF chose to use the 'caveats' of the Healthy Forest Restoration Act, the FS is able to bypass addressing best management practices, sound science and the long history of following the environmental laws and management regulations that used to be done to determine the feasibility of a project such as this.

Issue of presentation to public via the Scoping Letter and use of a Categorical Exclusion:

There are obvious problems with the scoping letter. The maps included did not show a majority of existing roads (open & closed), and not even the main road through the area, the 77 road. Upon request, a friend was able to get a corrected map. Thank you, Shaniko. However, that map, which I trust shows all the FS system roads, still does not show the majority of roads on private land within the project area, but especially on the West Wall east of the project area. That is not acceptable from nearly any perspective. You talk about improving wildlife habitat, yet ignore the fact that road density - a critical factor for wildlife - in the highly roaded project area and on the wall itself. As you are well aware, were this being done as a NEPA document, as it should be, that would be required.

The scoping letter does not provide enough sound supportive information, either from a biological or fire perspective, for a well-informed citizen to make a substantive comment. The FS did not identify the cumulative impact of clearcutting by Hancock on private lands on the West Wall. As you are well aware, were this being done as a NEPA document, as it should be, that would be required.

One only has to look at some comments Mike Billman, the NEO Federal Forest Restoration Program Coordinator at Oregon Department of Forestry, made in a letter last fall to know that even land managers may not be in agreement about how to do this project. Let's start with his comment, "Ultimately, NEPA decision making will dictate which parts of the project, if any, move forward, hence we are taking a bit of a gamble laying out the project area in advance." As this project planning moved forward, ultimately the WWNF chose to bypass NEPA planning as the project would not pass muster of an examination using sound science analysis and best management practices.
He also noted that, "Public input will be consistent with the NEPA planning process." Oops. Someone misunderstood the WWNF intent of the project, it appears.

Mr. Billman also noted, that since "ODF is participating in the WW project through Good Neighbor Authority…" then their comments should be taken seriously. Obviously, until they change their minds, they seem to have

been ignored as best as I can tell. He goes on to say, "The intent of WW is to create a fuel break along private property just above the valley." When I look at the map of the project, I see that the WWNF is planning logging over two miles west of the private property at the edge of the project area next to Pine Valley. Both from a fire science perspective and from WUI-driven 'defensible space' information, this project misses the mark. Is there an unspoken goal of the WWNF? Is this Mr. Billman's previously-referenced bit of a gamble?

Mr. Billman goes on to say, "We recommended some of these acres be dropped from the project, and ask to include some additional acres which did have fuel reduction opportunities. Currently, my field staff is estimating a project area of 400+ acres, down from the originally proposed 670 acres, which will include commercial timber harvest and non-commercial thinning." I cannot come to any other conclusion, given the extremely limited presentation by the WWNF, that this is purely a get-the-cut-out project. The fact that the project was specifically NOT pared back to what the ODF was originally talking about in the planning stages, but increased to just under the allowable size for avoiding NEPA requirements of following long-standing law and best management practices tells me there is a serious problem with the WWNF's ability to honestly defend this proposal.

The Categorical Exclusion is, from a conservation perspective, codified congressional intervention (Healthy Forest Restoration Act) to allow agencies to bypass existing environmental law and regulation, and to avoid following the concept of best management practices. I am fairly familiar with the NEPA process. In an upper division class I took through the College of Agriculture on environmental impact statements, which covered both NEPA and the Montana Environmental Policy Act (from the early '70's), we looked at projects much less impactive than this one that were done following the requirements of those two laws. I received a much more intense dive into NEPA through a 400-level special topics class on NEPA taught by a guest instructor who went on to head the environmental program for the Northwest Power Planning Council (which has since changed its name). Everything delineated in the law, and rules promulgated by the Council on Environmental Quality (up to that point) make it clear this project should be done using the NEPA process.

I would strongly urge the WWNF to withdraw this project for its failure to honestly address biology and the facts, and look at modern, science-driven methods for protecting private property in the WUI zone along the West Wall.

The use of logging for reducing fire risk:

Small fires, what we used to call smokechaser fires, are not at issue here. The real fire problem we face in this day and age is the rapid increase in climate-driven high severity fires. It is now common that logging, thinning and other vegetative management fail to slow the fires at all. There is a growing body of evidence to prove that - called the aftermath of the fires. The world of fire is not the same as when I was fighting fires. My last fire was 1988, a year that highlighted the coming of a changing scenario with fire. That year I was a backcountry ranger, not on a fire crew. I went up to a lookout to visit the longtime firespotter working that tower the day after he turned in a fire on the Forest a significant distance to the south. The fire was in an area with many roads and logging. The fire crews were on it with engines very quickly. They could not stop it as a small fire; it exploded in those extremely hot and dry conditions. Logging tends far more often than not to change a mesic forest system to a xeric forest system. Fire likes those latter conditions better.

The running fire breaks proposed along the road system will not address the changing nature of fire that is increasingly being driven by climactic conditions. In fact, increasing the width of the road corridors may well exacerbate the problem of wind being funneled through the forest, increasing intensity and speed.

We all have read of recent fires that have jumped interstate highways and even the Columbia River. The latter, of course, was the 2017 human-caused Eagle Creek fire that not only jumped the river, but the adjacent interstate paralleling it.

The Camp Fire at Paradise, CA, in 2018, received global coverage for its intensity. I read a report from an

ecologist who toured the area after the fire, observing the aftermath as well as doing some literature research on forest land treatments in the area. There had been significant logging and other vegetative management done all around the town and it never slowed the fire an iota. Possibly the opposite. The other fact of the Camp Fire, seen in pictures taken of the aftermath, is that some homes did not burn while all the ones around them did. Why? That should have been something the USFS should have spent time studying and presenting. The answer is that the homes not burned were 'hardened' in that they were built with fire resistant materials and had defensible space around them. That's where the fire prevention work, especially that labeled 'defensible' should begin.

The Dixie Fire in Northern California burned uninterrupted through countless thousands of acres of logged-over private timberlands. That fire was notorious at the time for setting some records, which in the few short years since are falling because of the ever-increasing heat and weather scenarios created by the global warming climate crisis. That summer was notorious for setting climate records of drought and heat.

Just in the last handful of years in Oregon we have seen fire after fire of high severity in which the logging and thinning of those forest lands failed completely to stop, let alone effectively slow the fire. The Bootleg Fire, the Holiday Farm Fire and the Millie Fire are all good examples. I know the FS has claimed that thinning helped with the Millie Fire, but the reality is that the weather changed and prevailing winds shifted dramatically moving the fire away from areas of concern and up into the rocks and ice.

Had the work of scientists like Dr. Jack Cohen, a fire scientist with years of experience, been paid more attention to, there would have been a whole heck of a lot less damage. The National Fire Protection Association's Firewise work emphasizes that to protect homes and buildings in the WUI zone, you start at the building and work out. Any other efforts are nearly moot for home and building protection.

As a seasonal FS employee on the Sula RD of the Bitterroot NF, I did extensive project work in the heavily logged and roaded areas on the eastern part of the district. I, in fact, was on the fire crew that cut out and prepared the helicopter pads for the Congressional Committee visits following the Sierra Club v Block decision. Block was the Secretary of Agriculture. As I presume you know, that decision changed how federal agencies could manage timber harvest on national forests nationwide.

Extensive logging had been done to create linear fire breaks for countless miles along roads throughout a very large area. (Understandably, everyone was wary after the Sleeping Child and Saddle Mountain fires in the area when I was a kid.) When a major fire struck in the late 90's, FS daily mapping of fire spread/intensity showed logged over areas burned hotter & faster than unlogged forest. I know that because the FS person doing the GIS mapping was a good friend and shared with me the maps and data, knowing that I knew that country extremely well. Uniquely, the area in which the fire burned slowest was within the Anaconda Pintlar Wilderness.

Private property owners must take steps to reduce the flammability of their homes and buildings and create a defensible space around them to protect from fire. This is the most important step in reducing loss from wildfire. In this day and age with the rapid increase of climate-driven, high severity fires, this level of prioritizing work starting at the buildings and working out should be where everyone's efforts are focused. The work of firewise groups around the country are doing just that. We have some great people helping with that in Pine Valley. And, actually, an acquaintance from the area where the Camp Fire burned (not in the immediate Paradise area) got her neighbors involved in firewise work before the fire ever happened. Her home and those of her immediate neighbors did not burn.

Concerns with using logging to improve big game habitat:

Ungulates primary needs are security cover and thermal cover. Roads and logging defeat that. The apparent road density in and on the east side of the project area appears to be at a level that exceeds big game needs.

Plenty of open ground for grazing already exists, so that is not even an issue.

The greatest benefit to wildlife in this project area would be to rip out the existing 'closed' roads that are now well used by motorized users, and not build any new ones. The existing road density along the top of the wall is very high. It is disingenuous for the WWNF to claim this project will enhance elk habitat.

'A Brief Review of the Scientific Literature on Elk, Roads, & Traffic' by Dr. Scott McCorquodale, a wildlife research scientist with the Washington Department of Fish and Wildlife is one paper that delves into the significant problem with roads and ungulates. I no longer have the Elk Logging Study done by wildlife biologists in Montana in the '80's, but its conclusions were that the land managers needed to reduce existing roads where the density was high, like we see on the West Wall and in this project area.

You cannot improve wildlife habitat without addressing road density. The McCorquodale paper notes that as road densities increased above 2 miles of open roads per square mile, habitat effectiveness - the percent of expected use - declined rapidly with a loss of habitat effectiveness ranging between 55-80%.

As I remember, the Montana Elk Logging Study recommended no more than a mile of road per square mile to retain existing habitat effectiveness.

When we are dealing with an important part of our natural biosystem, the elk and other ungulates for that matter, land managers should be erring on the side of caution to minimize the impact of a project like this on the wildlife.

Conclusion:

The WWNF has not done its due diligence in the presentation of this project. Friends have asked me questions about what the Forest Service means by this or that in the scoping document. Well, without the necessary definitions of innocuous terms used, and the necessary documentation presented to justify the proposal, I tell have no choice but to tell them that they are being baffled by bullpuckey. But I do add that it would not necessarily be the case if this project were done via an Environmental Assessment under the guidelines of NEPA.

The scoping document as presented fails to make a scientifically justifiable argument for the project to proceed. The maps in it are basically worthless. The minimal data is incomplete at best. From the 'Purpose and Need' all the way to the bottom of the 'Proposed Action' discussion of the project is completely missing supporting data. What is there seems to hang without explanation. The fact that more information is presented by the WWNF to explain why you are using the CE process to avoid having to do the work the public should expect out of the managers of our public lands. That is the opposite of how management of our national forest should be done.

I would urge the Wallowa Whitman NF management team to rescind this project proposal for the time being and revisit it using sound science and best management practices. That can be best achieved using the NEPA process.

Thank you.