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Organization:

Title:

Comments: March 10, 2024

To: USFS Wallowa-Whitman National Forest

1550 Dewey Ave.

Baker City, OR 97814

From: Mike and Donna Higgins

Re: Proposed West Wall project, Pine Valley, Baker County, OR

As former long-time residents on the West Wall of Pine Valley (over forty years) with timber and irrigated pasture land that abutted the USFS lands on the West Wall, we have some serious concerns about the proposed project, to wit:

1. Our primary objective during those forty+ years was the enhancement of its wildlife habitat, from elk and deer to cougars, wolves and turkeys. Since the West Wall was - and continues to be - an integral part of the migration corridor from the Eagle Cap Wilderness Area to the Snake River breaks, our efforts extended that corridor, making it even more vital as we humans attempt to repair the damage we have done to natural ecosystems.
2. Over the many years we lived there, we experienced several natural events that affected the overall balance in that ecosystem, from lightning strikes to what we described as micro-bursts, severe and concentrated wind events that resulted in lots of downed trees. One such event required an entire summer of cleaning-up - from entire trees to the limbs and debris left behind - in order to minimize the potential of insect infestations. Each clean-up caused an absence of the larger critters for at least a year, sometimes two, before returning to normal corridor conditions. Our lesson: we have enough "natural disruptions" without creating more by our arbitrary/voluntary decisions, such as this proposed West Wall project.
3. How much consideration in the planning process has been given to previous logging projects on or near the West Wall of Pine Valley, especially to the one(s) done by Hancock Timber Resources Group in the Carson Creek basin recently? Based on opinions of people qualified to assess the long-term damage caused by that clear cut, especially the damage to the hiding and thermal cover provided by the Carson Creek vegetation, there shouldn't be any additional disruption (read: logging) for a minimum of 100 years. Repeated entries into an area the size of the West Wall project will cause continuous, long-term damage, making it extremely difficult, perhaps impossible, for the ecosystem to ever recover.
4. Beginning several years ago, a community-based effort was started to reduce the possibility of fire-caused damage to privately owned property. Labeled the Firewise Project, that effort has been very successful, resulting in most private holdings being protected from forest/range fires. In addition to participating in the Firewise effort, we have been very proactive in attempting to protect our property from fire by participating in a National Fire Program back in the early 2000s. The purpose of the program was to reduce "ladder fuels" in our forested lands, as part of our overall wildlife enhancement objective. We managed to complete that NFP program with a minimum of disruption to our forest ecosystem. Based on the pictures/videos from our Trailcam, the light-touch efforts we employed were favorably received by the resident critters, large and small.

5. One of the largest issues we have with the proposed West Wall project is that it ignores the potential impact the project will have on domestic water supplies (read: springs) that many folks who live on or near the West Wall depend on for household use. In addition, based on our reading of the information provided in the scoping letter, nothing re the irrigation ditches (Highline-Curry and Posey Valley ditches) has been considered. Since nearly all irrigators on the West Wall depend on the water delivered by these ditches, the lack of any information re these ditches implies that the planners of this project consider this water issue unimportant. For the domestic and irrigation water users of Pine Valley, this is a huge issue!

6. Nearly all recent studies of the importance of fire in ecosystems have concluded that fire is an essential part of creating a healthy, resilient ecosystem. In spite of those conclusions, the project proposed for the West Wall continues to promote the false narrative that fire in a forest ecosystem is bad and should be suppressed and/or eliminated at all costs. Rather than continue to throw huge sums of money at fire suppression, it makes much more sense to allow fire to be restored into its former, natural place in creating and maintaining healthy, vibrant ecosystems. This approach will require a much longer-range plan than the one that's been employed by government agencies for the past 75-100 years, but that plan has already proven ineffective, so needs to be replaced by a plan that works with the natural processes rather than against them.

7. Why is this project being proposed under a Categorical Exclusion? As anyone familiar with the CE guidelines knows, that designation will discourage comments from the public about the desirability or efficacy of the project. In this case, using the CE designation appears to be for the purpose of rushing it through, without having to deal with endless and/or unfavorable input. As members of that "public", ones who have a long history of interacting with your agency on various projects, we find that choice to be extremely objectionable. Considering the potential impacts of the project on the residents of Pine Valley, present and future, the decision to use the CE designation is also very short-sighted. Undertaking this project, with all of those present and future implications, would have been much more thoroughly analyzed by an Environmental Impact Study. Importantly, use of an EIS would have offered Pine Valley residents a much better opportunity for input re this project than this CE has. Another question: If the Baker City Watershed deserves a more thorough evaluation (an Environmental Assessment) of the impacts of logging and related activities on it, why is the Watershed of Pine Valley being treated differently, with a Categorical Exclusion?

8. In early Fall of 1988, the Forest Service-sponsored Consensus Process kicked off a community-wide collaboration of folks interested in participating in decision making in the Pine Districts forests. After a week of intense group instruction, led by Forest Service contractor Bob Chadwick, the group was challenged by then-Wallowa Whitman Forest Supervisor Bob Richmond to develop a management plan for the Pine District. After some discussion, the group accepted Bob's challenge. That was the beginning of what turned out to be a nearly-six-year effort. Over that period, the group's make-up and size changed, depending on several factors, e.g.: whether the bi-weekly meetings were held in Baker City or Halfway; the level of commitment of the individuals involved; what the winter road conditions were; who among the group had kids with the flu, etc. Due to many different factors, the larger group became a smaller, core group made up of a cross-section of folks from the business community, the Forest Service, the timber industry, the farming/ranching community; the "just community folks" and the "environmentalist" community.

Even though some of the issues discussed were sometimes highly contentious, the group continued to work together toward the common goal: a management plan for the Pine District. What resulted, as described by logging-company owner and group-member, Chuck Phegley, was much more than that: A group that became close friends, working respectfully together to create a workable plan.

The plan, what the group described as MS 20-21, was a system of cores and corridors, in which human intervention would be an absolute minimum (including but not limited to, fire suppression) and with the emphasis on creating and maintaining wildlife habitat. The cores were to be connected by corridors of like-managed wildlife habitat, large enough to be viable for the movement of wildlife from one core to another. What was visualized by the group was a Pine District landscape made up of cores and corridors surrounded by gradually-more-intensively managed areas, in which logging would be allowed but only on a basis dictated by the need to control insect infestations or limited other stand-threatening events.

Even though the desire of some of the group members - to have the Pine District designated a model district - wasn't realized, the MS 20-21 Plan was unofficially adopted and/or became the guide for the management of many Ranger Districts throughout the northwest.

The West Wall of Pine Valley was, and still is, an integral and essential part of MS 20-21 and deserves to be managed properly, with the respect and care such a unique part the landscape deserves. Minimizing the impacts of human activity should be the primary focus of future management. A partial list of the ways to accomplish that goal:

1. Protection of (read: no logging) of old growth trees, of any species;
2. No additional roads (already enough, far more dense than necessary!) and a gradual decommissioning of existing roads, leaving in place only the roads which provide access to McBride C.G. and the Eagle Cap Wilderness (FS Road 77 & the Carson Grade Road);
3. Rather than thinning or other methods of "fire suppression", use the money that would be spent on those methods to expand the "hardening" of homes through the existing Firewise Program;
4. Protection of the viewshed, for present and future residents as well as for folks who choose to visit the Valley for recreation, should be a top priority;
5. A gradual phasing-out of grazing permits, thus eliminating the conflicts and other problems (weeds and the use of pesticides, contamination of water sources, maintenance of fences, etc.) associated with cattle grazing;

Although just a partial list, management of the forests of the West Wall by standards such as these would help maintain these forests - and what they represent to the folks who rely on them - in their present condition, without further degradation.

Thank you for the opportunity to comment on the proposed West Wall project.

Sincerely,

Mike and Donna Higgins