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Comments: North Slope Vegetation Management Project Comments and Questions

-Didn't wildfires burn a large portion of the project area in 2024? How are these burned acres part of the proposal? Are the units labeled commercial thinning with mortality treatment actually proposed fire salvage? Did they areas burn hot with high mortality?

-Are there more acres that need to be treated but aren't being proposed for treatment (commercial and non-commercial) because they are on slopes greater than 35 percent? Forested areas that need treatment to improve forest health or reduce the risk of wildfire should be proposed for treatment with alternative equipment or methods regardless of the steepness of the slope.

-The project area is 52,710 acres in size, yet only 7,830 acres are proposed to be commercially treated. This is less than 15 percent of the project area. How will this proposal improve forest health and reduce the risk of wildfire when so few acres are proposed for treatment?

-Dry forest types located in riparian areas should be treated with commercial and non-commercial treatments to improve forest health, reduce the risk of wildfire and to improve conditions for riparian species like willow and cottonwood that need sunlight to thrive. Not enough acres in riparian areas are proposed for treatment in the proposal.

-The statement on page 5, paragraph 2 of the scoping letter enclosure says, "...timber harvest practices selectively removed large fire-tolerant trees allowing fire-intolerant species to dominate the landscape. Is this statement really true for the entire history of logging in this project area? Region 6 implemented the Eastside Screens in 1995 and that policy drastically changed forest management practices on the Ochoco National Forest (NF). That change was about 31 years ago. During the past 31 years the Ochoco NF basically stopped harvesting trees over 21-inch DBH regardless of their health, age, or consideration of whether or not the leave tree species was resilient for long-term forest resiliency. For the most part during those 31 years the Ochoco NF stopped harvesting dead trees as well. I suggest that the implementation of Eastside Screens was a contributing factor to the current forest health conditions of the Ochoco National Forest, as well as some of the tree mortality that the Forest has experienced.

-I also wonder about another statement on page 5, the section titled "Plantations" where it is stated that the plantations in the project area are basically the same age and that they were previously open stands dominated by ponderosa pine. This statement may be true for some plantation but not likely all of them. The north slope project area has some of the most productive and deep soils on the Ochoco NF and historically some stands were quite diverse in species composition. I have seen Engelmann spruce and subalpine fir in the Keeton Creek area and those species are not associated with a dry forest condition. In areas lodgepole pine is common, and it is the dominant tree species in some stands today, like it has been historically. There are plenty of grand fir dominated stands in the project area that are a moist forest type, that are very large trees of late seral state. I have seen big huckleberry in association with these moist grand fir stands. The past practice of regeneration harvest on steep slopes in this project area could have been the best forest management practice to use at that time given the species composition of the stand, the presence of insects and disease and the logging method used to treat a steep slope.