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First name: Pam

Last name: Hardy

Organization:

Title:

Comments: Comments: Emigrant Creek Ranger District Danger Tree Removal Project

Dear Lori,

Please accept these comments a bit late. Your original deadline was during the Thanksgiving holiday, and I was out of town. These are on the first business day after that.

Emigrant Creek Ranger District is working hard to cope with the results of pine butterfly, pine beetle and drought all hitting at the same time. Thank you for your hard and diligent work to address this issue. It is unfortunate that so many trees have died, or will die, as a result. Of course, hazard trees need to be removed along roads and in campgrounds. And, if they can pay for themselves, or put dollars in the local coffers to pay for other restoration work, that would be helpful.

I have one concern about the project. I recently saw a study (attached) that showed that it is very difficult to determine which trees are likely to die in the next three years. It determined that while the standard methods used are 95% accurate at predicting which trees will be alive they are only 24% accurate at predicting which trees will be dead. AND, that's the best method out there. Some of the other methods had a less than 10% likelihood of being correct. (I am proud to note that the best model was from the Malheur NF!)

Still, 24% accuracy is less than a coin toss. This is problematic if you are going to be taking not-quite-dead old growth.

Please address this study in your EA, and explain what you're doing to ensure that your predictions are accurate.

Many Thanks

~ Pam

Pamela Hardy

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----- Original Message -----

Subject:Emigrant Creek Ranger District Danger Tree Removal ProjectDate:2017-10-25 11:13 amFrom:"Ward, Melissa -FS" <mward@fs.fed.us>To:"kruether@onda.org" <kruether@onda.org>, Brian Pon <kbpon@comcast.net>, "dh@oregonwild.org" <dh@oregonwild.org>, "director@harneycounty.com" <director@harneycounty.com>, "davewiley@wvi.com" <davewiley@wvi.com>, "diane.teeman@burnspaiute-nsn.gov" <diane.teeman@burnspaiute-nsn.gov>, "Dustin.Johnson@oregonstate.edu" <Dustin.Johnson@oregonstate.edu>, "dwayne73meadows@yahoo.com" <dwayne73meadows@yahoo.com>, "kperlot@hotmail.com" <kperlot@hotmail.com>, "rod049@yahoo.com" <rod049@yahoo.com>, "myerssw@grantcounty-or.gov" <myerssw@grantcounty-or.gov>, "ijerome@amforest.org" <ijerome@amforest.org>, "jksouthw@oregonvos.net" <jksouthw@oregonvos.net>, "jason.kesling@burnspaiute-nsn.gov" <jason.kesling@burnspaiute-nsn.gov>, "valleyranch@ortelco.net" <valleyranch@ortelco.net>, "joeandgloria@centurytel.net" <joeandgloria@centurytel.net>, "jdegroot@nezperce.org" <jdegroot@nezperce.org>, "Kinginc@centurytel.net" <Kinginc@centurytel.net>, "KSAK@UWOL.Net" <KSAK@UWOL.Net>, "lshammond38@yahoo.com" <lshammond38@yahoo.com>, "lstillwater@gmail.com" <lstillwater@gmail.com>, "jschultz001@centurytel.net" <jschultz001@centurytel.net>,

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Good morning!!

Today the Emigrant Creek Ranger District Danger Tree Removal Project is out for the beginning of the scoping period. Attached you will find the scoping package and the maps for this project. Below is the scoping letter. Thank you for your interest in the projects on the Emigrant Creek Ranger District of the Malheur National Forest!

Dear Interested Reader,

The Emigrant Creek Ranger District of the Malheur National Forest is proposing the Emigrant Creek Ranger District Danger Tree Removal Project. The district wide danger tree removal project is located on the Malheur National Forest; Emigrant Creek Ranger District; in portions of the Silvies, Upper Malheur, Harney/Malheur Lakes, Upper John Day, Beaver/South Fork, and Silver subbasins; within Harney, Grant, and Crook Counties. The proposal includes removal of identified danger trees whose potential failure zone encompasses forest travel routes (arterial and collector roads), campgrounds and other improvements and structures; some danger trees would be removed commercially, others would be cut down but left on site. The potential failure zone is the area that could be reached by any part of a failed tree. It's generally defined as a circle with a radius of 1 ½ times the tree height or dislodged tree segment plus additional distance for ground slope and tree lean.

The project was developed in cooperation with the Harney County Restoration Collaborative (HCRC). The purpose of the project is to (1) provide for worker and public health and safety by removing danger trees along forest travel routes (arterial and collector roads), campgrounds and other improvements and structures on the Emigrant Creek Ranger District; and (2) recover the economic value of danger trees as rapidly as practicable to maximize potential economic benefits consistent with reasonable protection of other resource values. An Environmental Assessment should form the basis for a decision. For more information about the proposed action, a scoping package can be obtained from the Emigrant Creek District Office in Hines, Oregon or on the Malheur National Forest website at <https://www.fs.usda.gov/project/?project=52029>.

This project is a non-fuels reduction act (HFRA) project, and is subject to the Project-Level Pre-decisional Administrative Review Process (Objection process) as identified in 36 CFR 218, Subparts A and B. Individuals and entities (non-governmental organizations, businesses, partnerships, state and local governments, Alaska Native Corporations, and Indian Tribes) who have submitted timely, specific written comments regarding a proposed project or activity during any designated opportunity for public comment may file an objection. Opportunity for public comment on an Environmental Assessment includes during scoping, the 30 day public review period, or any other instance where the responsible official seeks written comments.

Written comments are those submitted to the responsible official or designee during a designated opportunity for public participation provided for a proposed project. Specific written comments should be within the scope of the proposed action, have a direct relationship to the proposed action, and must include supporting reasons for the responsible official to consider.

During this scoping phase of the NEPA process, we are seeking input, either verbal or written. We are interested in any site specific issues, concerns or opportunities that you think need to be considered in the development of this analysis.

Please submit your comments by November 24th, 2017 to Lori Bailey at 265 Highway 20 South, Hines Oregon 97738, or telephone (541) 573-4300. Comments may also be emailed to: comments-pacificnorthwest-malheur-emigrantcreek@fs.fed.us. Thank you for your interest in the management of the Malheur National Forest.

Melissa Ward
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