



FSEEE Forest Service Employees for Environmental Ethics

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Amber Sprinkle
USDA-Forest Service
Clackamas Ranger District, Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

Dear Ms. Sprinkle,

Thank you for this opportunity to comment on the Clackamas Fires Roadside Danger Tree Draft Environmental Assessment.

The scope and magnitude of this Project argue for an environmental impact statement. The Project maps suggest that this could be the largest national forest logging project in Clackamas district history, whether measured by trees and timber volume removed, or by acres affected by logging. The Forest Service has documented that post-fire logging of a much lesser scale and scope compared to your proposal has significant environmental effects. In 1993, the Willamette National Forest disclosed significant environmental effects associated with salvage logging 39 million board feet on 1,197 acres burned by the Warner Fire. In 2015, the Klamath National Forest assessed alternatives and disclosed significant environmental impacts in an EIS for the [Westside Fire Recovery Project](#) that includes 320 miles of roadside salvage totaling 14,320 acres. In 2004, the Deschutes National Forest disclosed significant environmental effects in the [18 Fire Recovery Project FEIS](#) associated with salvage logging 1,886 acres of fire-burned forest and, in the [Davis Fire Recovery Project FEIS](#), with salvage logging of up to 6,335 acres. In the [Toolbox Fire Recovery Project FEIS](#) the Fremont National Forest disclosed significant effects associated with salvage logging of approximately 21,500 acres in the Silver Creek, Silver Lake and Summer Lake Watersheds and removal of hazardous trees along open roads and at recreational facilities. It is inexplicable that a logging project that dwarfs these others in scope and scale is assumed to have no significant direct or cumulative impacts.

You assert that certain trees pose a safety risk to human life, including public visitors and forest workers who use the road, trails, and facilities. However, you provide no factual evidence to support this assertion; in fact, it is simply not true. As explained in the attached declaration by Professor Travis Heggie, a world-class expert in backcountry safety hazards and the former Public Risk Management Specialist and Tort Claims Officer for the National Park Service, “the odds of being hit by a falling tree are so miniscule, trees are not generally considered to be hazardous let alone a recreational hazard.” Hiking and climbing are the leading cause of

backcountry deaths (40%), while avalanches account for 15%, drowning incidents 10%, and heart attacks 10%. Trees account for the same number of fatalities as do bears – 1%, i.e., about 1 person per year. And of that 1%, dead, dying, or damaged trees (i.e., the trees you claim are “hazardous”) account for fewer deaths than do live, healthy trees.¹ Thus, by your logic, the Forest Service ought to cut down all trees. After all, as Dr. Heggie points out, “it is an inescapable fact of entropy that all trees fall down at some point during their existence.” It appears the Forest Service’s solution to this basic physics fact is to log every tree before it falls down, no matter the *de minimus* risk to public safety.

NEPA requires the Forest Service assess quantitatively the purported benefits of its proposed action, in addition to its environmental costs. In considering whether to prepare an EIS, an agency must consider “[i]mpacts that may be both beneficial and adverse.” *Id.* at § 1508.27(b)(1). Agencies must also consider “[t]he **degree** to which the proposed action affects public health or safety.” *Id.* at § 1508.27(b)(2). *350 Mont. v. Bernhardt*, 443 F. Supp. 3d 1185 (D. Mont. 2020) (emphasis added). Where the risks to public safety can be quantified, as here, NEPA requires the Forest Service do so. *See, e.g., id.* (Risk of train derailments can be quantified, thus agency must do so in NEPA document).

We ask that the Forest Service calculate the fatalities and injuries associated with taking no action as compared to the proposed Project. How many injuries will be avoided and lives will be saved? In making this analysis, the Forest Service should incorporate the fact that cutting trees is among America’s most dangerous occupations, and cutting dead trees is particularly hazardous. As Dr. Heggie points out, “When fallers cut a tree, the chance they are in the potential kill zone is a 100% certainty. When extreme weather or other natural forces cause a tree to fall, the odds that anyone is in the potential kill zone are minimal.” In essence, the Project turns what is a very small safety risk to the general public into a major safety risk to loggers. Your analysis should quantify and disclose these facts so that you and the public can assess whether the Project is justified for the purported safety benefits you assert.

Sincerely,



Andy Stahl
Executive Director

¹ Three days ago, [a live maple tree fell](#) killing a camper in Olympic National Park. Also this month, a 14-year-old volunteer with Friends of Trees was [killed by a falling branch](#) from a live tree while planting seedlings in the Forest Service’s Sandy River Delta, a part of the Columbia River Gorge National Scenic Area. [A 10-year-old boy was killed](#) in August when the car he was riding in with his family on U.S. 276 in the Pisgah National Forest was hit by a live oak tree. In 2020, [a windstorm felled](#) an Ochoco national forest live tree onto a camp trailer, crushing and killing the occupant. In June, 2021, a windstorm felled a live tree in the Boise national forest’s Antelope Campground, killing one person. In 2013, [high wind uprooted a live, 200-foot](#) tall tree, in an Idaho Panhandle national forest campground, killing one person. In 2015, a 15-year-old attending Bible camp at Minister Creek Campgrounds in the [Allegheny National Forest was killed](#) when strong storms blew over a live tree.