Middle East Fork Project
Summary of Objection Issues and Suggested Remedies

Project Name: Middle East Fork Hazardous Fuels Reduction Project
Objector: Derek Goldman
Objection Number: 0007

Issue 1. (OLD GROWTH) Main objection centers on proposed logging of old growth forest stands.

Hiked through units 12a, 13, 7, 39, 6a and 6b and:

- These stands are not "uniform and dense," in fact they are characterized by high levels of biodiversity and structural complexity—key ecosystem components of old growth areas.
- Many large old Douglas-firs, old enough to pre-date fire suppression are present. Thus, it seems that these stands were in fact, not historically dominated by ponderosa pine.
- Furthermore, these stands are not characterized by a high level of beetle-killed trees.

Logging in old growth stands will have the following deleterious ecological consequences:

- Loss of old snags and decadent trees, which are important for forest biota. According to renowned ecologist Jerry Franklin, more than 20 percent of forest biodiversity is associated with dead wood.
- Opening of the canopy leads to drying of soils, changing the species composition of the site. It will also result in loss of thermal cover necessary for elk winter habitat.
- Reduction in structural complexity, and therefore loss of niches for various species of old-growth dependent flora and fauna.
- Damage to complex soil structure that has evolved over many decades, as well as mosses, cyano-lichens, etc.
- Loss of ecological processes, including insect and disease activity.

Suggested remedy: Please remove areas of old growth forest from the preferred alternative.

Regional Review and Response: None of the units mentioned by the objector are old growth habitat. Each of these units were field surveyed in 2004 and old growth criteria assessed. None of the stands within these units meet criteria for old growth as described in the Forest Plan or Green, et al. (1993, errata 2005). No commercial treatments are proposed in any old growth habitat as defined by the Forest Plan and Green, et al. (1992, errata 2005).

In every treatment area the largest, live healthy trees will be left. Generally, between 40 percent and 95 percent of all the live overstory will remain in every unit after harvest, and at least 2–15 of the largest dead or dying trees will be left per acre, as well.

As mortality increases in the Middle East Fork area some stands no longer retain old growth habitat characteristics. The Douglas-fir bark beetle epidemic has caused high mortality in the

large Douglas-fir throughout the Middle East Fork area moving many of these stands out of consideration as old growth. Treatments planned in existing old growth stands in Alternatives 2 and 3 consist only of slashing and prescribed fire fuel reduction treatments. These treatments will retain the old growth habitat characteristics of the stands if in fact these stands still qualify as old growth when treatments are undertaken.

The field observations and data collected by the Interdisciplinary Team's fire specialist and silviculturist differ substantially from the objector's description of the units mentioned, most significantly related to the existing Douglas-fir mortality in the units. The following information is used to help illustrate the differences – however this is a quick overview – the Forest has extensive data for each unit the objector mentioned.

Stand Composition
The Environmental Impact Statement (EIS) describes these units as dominated by Douglas-fir in Section 3.2. Also see the response to Public Concern ID 3603 in the Final Environmental Impact Statement (FEIS). In addition, the Silviculturist describes units 12a, 13, 7, 39, 6 as having a marked reduction in the ponderosa pine component where it was historically present. Silvicultural diagnoses for these units are contained within the project file (SILV-040) that provides specific information relative to the forested species distributions and structure within these units.

Mortality
These stands are characterized by a high level of beetle-killed trees. For example, based on a variable plot statistical stand examination of five stands in Unit 6 conducted in 2004 the percent mortality due to bark beetles was 38 percent, 44 percent, 75 percent, 55 percent, and 54 percent (SILV-012). Additional mortality was incurred in 2005. Confirming this finding were walkthrough exams conducted by the fuel specialist who documented (FIRE-019) Unit 6a and 6b to contain 60 percent mortality and silvicultural diagnoses completed by silvicultural personnel (SILV-040). Based on the silvicultural diagnosis, Unit 7 contains 50 percent mortality (SILV-040). The silvicultural diagnosis completed in 2005 in Unit 12a documented 50 percent+ - 70 percent+ mortality resulting from both bark beetles and fire damage (SILV-040). The fuel specialist documented Unit 12a to have 40 to 60 percent Douglas-fir mortality with some of the stand containing lodgepole pine and mortality from mountain pine beetle in 2004 (FIRE-019). The silvicultural diagnosis finalized in 2005 for Unit 13 documented 70-80 percent mortality (SILV-040). The silvicultural diagnosis Unit 39 documented approximately 60 percent mortality (SILV-040).

Photos clearly show stands containing substantial tree mortality. Two are provided as examples. Again, there is no commercial logging proposed in old growth habitat.

Mitigations for all treatment units in the project are designed to eliminate or minimize impacts to resources and retain large trees. Snags and downed woody debris will be retained at levels within historic ranges for the specific stand habitat type.

Unit 13

Unit 6a