

Doug Heiken
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Sent by: Doug Heiken
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01/10/2007 03:58 PM
Please respond to Doug
Heiken

To: Doug Heiken <onrcdoug@oregonwild.org>
cc: comments-pacificnorthwest@fs.fed.us, Andy Kerr <andykerr@andykerr.net>, Mike Anderson <mikeanderson@fs.fed.us>, Tim Lillebo <tl@oregonwild.org>
Subject: Re: ONRC comments on the Burnt Willow Project

Dear Joel:

In response to your Dec 14, 2006 letter proposing to allow the removal of large white fir (>21" dbh) in the Burnt Willow Project, Oregon Wild does not object to the proposed change given the following assumptions/qualifications which your letter appears to concur with:

- 1) Each large white fir trees to be removed is determined to be in direct competition with a large fire resistant tree species (>21" dbh) , i.e., large white fir should not be removed where the pines that will allegedly benefit are located outside the reach of the roots of the white fir tree(s) to be removed. Put another way, indirect fuel reduction benefits should not justify this exception.
- 2) The removal of large white fir is exceptional in scale and limited to a small subset of the larger project.
- 3) This proposal will take place in areas already identified for harvest in the Burnt Willow EA and won't require any additional road building.

Please let us know if these assumptions are incorrect, so we can clarify/resolve any misunderstandings.

Sincerely,
/s/
Doug Heiken

Doug Heiken wrote:

Oregon Natural Resources Council
PO Box 11648, Eugene OR 97440
541-344-0675, fax 541-343-0996
dh@onrc.org <http://www.onrc.org/>

14 August 2006

Terry Sodorff
Lakeview District Ranger
Winema-Fremont NF
comments-pacificnorthwest-fremont-lakeview@fs.fed.us

Subject: Comments on the Burnt Willow Project Draft EA

Dear Forest Service:

Please accept the following comments from Oregon Natural Resources Council and Klamath Siskiyou Wildlands Center concerning the Burnt Willow Project Draft EA dated July 14, 2006. ONRC represents about 5,000 members who support our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded. This can be accomplished by moving over-represented ecosystem elements (such as logged and roaded areas) toward characteristics that are currently under-represented (such as roadless areas and complex old forest).

The proposed action alternative 2 involves:

3,200 acres of ground-based logging (removing primarily live trees <21" dbh) with various fuel treatments
13 mmbf

2,800 acres non-commercial thinning including RHCAs

5,000 acres of prescribed fire in three large blocks

6 miles of new temp roads

21 miles of temp roads on top of decommissioned roads

41 acres of conifer treatments to enhance meadows

There are uninventoried roadless areas in sections 3, 10, 15, 22, and 23. These roadless areas are contiguous with the Crane Mountain Inventoried roadless area to the west. See the attached map. Several of the logging units and several of the "new" temporary roads would be located in the unroaded areas. The FS should consider the values contained in this roadless area and the direct, indirect, and cumulative effects of logging in this area. For instance, roadless areas are one of the few places that large snags might reach natural levels. Thinning will capture mortality and prevent these roadless areas from helping to mitigate for the regional shortage of large snags relative to the HRV. The FS should prepare an EIS to consider these significant roadless issues.

The FS needs to do a better job of balancing the competing objectives of habitat, fuel reduction, and profitability. Recent research by the FS points out that profitability conflicts with both fuel reduction objectives and habitat objectives. Removing too much canopy can actually increase fire hazard instead of decrease it. This is a result of excessive slash generation, making the forest microclimate hotter, dryer, and windier, and by stimulating the growth of future ladder fuels. In general, reducing the risk of crown fire often tends to increase the rate of spread of surface fire. The agency tends to focus on crown fire reduction, not because it makes the most ecological sense, but because it generates money. This project also proposed to use "lop and scatter" which is one of the most hazardous fuel treatments, almost always resulting in greater fire hazard than not thinning at all.

There is also new information indicating that the agency's snag habitat standards are inadequate, and excessive thinning "captures mortality" that should be retained to provide much needed snag habitat. The EA completely misuses DecAID and implies that since the project does not intentionally remove dead trees there will be no effect on snag associated species. This is wrong on several levels. First, logging always requires the felling of hazard trees inside and adjacent to work areas including haul routes. Second, all logging "captures mortality" that would normally be recruited as a snag or down wood at some point in the future. DecAID admits that it does not account for snag fall rates or snag recruitment rates, but the FS continues to misuse it as a static tool without a snag dynamics module.

The EA lacks sufficient support and analysis of the competing interests to support well-informed public comment or a well-informed decision. The critical question is how much material can be taken and how much needs to be retained to meet all the objectives of fire risk reduction and habitat maintenance. Analytically untangling the complex interactions among all the different agency objectives is a good reason to prepare an EIS.

This project includes too much ground based logging and too many roads. Soil and water impacts are likely to be significant requiring an EIS. Temporary roads may have short-term (temporary) use but regardless of the short-term use, all roads have long term impacts on soil and water.

Whole tree yarding might be attractive from a fuels standpoint, but it has an adverse consequence of removing significant amounts of nutrients from the sites where it belongs.

Burning large slash piles after a project like this exacerbates soil, water, and weed, impacts that are already significant due to roads and ground-based logging. These significant soil and water quality impacts will retard attainment of aquatic objectives in violation of INFISH.

The FS should focus on the causes rather than the consequences of the forest health problem. Start by eliminating livestock grazing and reforming fire suppression and salvage policies.

Sincerely,

Doug Heiken

For

ONRC, PO Box 11648, Eugene OR 97440, and
KSWC, PO Box 102, Ashland OR 97520

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[Doug Heiken](#)

Conservation and Restoration Coordinator

[Oregon Wild](#) formerly Oregon Natural Resources Council (ONRC)

Protecting Oregon's wildlands, wildlife and waters since 1974.

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