

**Blue Mountains Biodiversity Project Comments--
South George Vegetation and Fuels Management Project**

To: Monte Fujishin, District Ranger
Umatilla National Forest
Pomeroy Ranger District
71 W. Main St.
Pomeroy, Washington 99347

From: Karen Coulter, Director
Blue Mountains Biodiversity Project,
League of Wilderness Defenders
27803 Williams Lane
Fossil, Oregon 997830 April 2nd, 2012

*Please mail us a large scale map showing proposed Alt. B sale unit numbers, sale unit boundaries, type of management proposed for each sale unit, open roads and road numbers, closed roads, streams and stream names, Inventoried Roadless Area boundaries, section numbers, Township and Range numbers, and locations of old forest (by color coding or cross-hatching.) We would appreciate receiving this map by mail as soon as possible.

Summary:

We are concerned by the proposed logging of undeveloped, never logged old growth forest and large trees and degradation or elimination of suitable habitat for Pileated woodpecker, Three-toed woodpecker, American marten, Gray wolf, Canada lynx, Rocky Mountain elk, Northern goshawk, Great Gray owl, Three-toed woodpecker, Black bear, Tailed frog, Neotropical songbirds, Margined sculpin, and headwater tributary habitat for Bull trout, Redband trout, Snake River Summer Steelhead trout, and Chinook salmon.

The "South George Vegetation and Fuels Management Project" is located between the Asotin Creek Inventoried Roadless Area (IRA) and the Wenatchee Creek IRA just northeast of the Wenaha-Tucannon Wilderness Area and north of the breaks of the Grand Ronde River on the Pomeroy District of the Umatilla National Forest in Washington. This is adjacent to a large block of de facto wilderness back country, which is key to the successful re-establishment of Gray wolves and the vitality of far-ranging species including Canada lynx, American marten, and Wolverine, and old growth and dense forest-adapted species such as Pileated woodpecker, Northern goshawk, Three-toed woodpecker, and various Neotropical songbirds. The Forest Service admits that at least 43% of the South George project area itself is undeveloped land that has no history of past logging and no roads--a rare condition on National Forest land that is key to restoring now rare far-ranging wildlife species, including keystone predators like wolves and lynx who are vital to maintaining ecological balance.

Unfortunately the Forest Service fails to recognize the irreplaceable value of remaining pristine wild lands for wildlife habitat, clean water supply, recreation, scientific research, and carbon storage to slow and diminish climate change. Instead the Forest Service is planning heavy logging, including clearcutting and logging of old forests and large trees over 21" diameter even within never logged forest, including within a block of never logged and roadless forest identified by Oregon Wild that is at least 3,485 acres. The Forest Service preferred alternative B would commercially log and reduce down wood, snags, and small trees over 3,900 acres and construct 3 miles of "temporary" roads. This would include 800 acres of clearcuts and virtual clearcuts ("seedtree" cuts), 300 acres of helicopter logging and 850 acres of skyline yarding logging on presumably steep slopes, and an unspecified number of large trees over 21" dbh logged over 620 acres and hazard trees removed. Both alternatives B and C would convert apparently natural multi-layered canopy old forest dominated by Grand fir and Douglas fir to single canopy layer ("single strata") forest by removing most of the Grand fir and also targeting

Englemann spruce for removal over about 580 acres, claiming that no old forest would be lost, though it would be seriously degraded or eliminated as habitat for old growth mixed conifer-dependent species such as Pileated woodpecker and American marten. Even alternative D, which is supposed to maintain existing old forest, would log in 430 acres of old forest. All three action alternatives (B,C, and D) would log out large trees over 21" dbh over 620 acres, yet the Forest Service has the audacity and blatant dishonesty to claim that the net result of all their logging would be to somehow increase old forest by 640 acres--miraculously by logging in non-old growth forest stands!

The three action alternatives all propose extensive logging, including logging in old forest, virtual clearcutting, logging in never-logged forest, and logging on steep slopes. None of these alternatives would save Pileated woodpeckers, American marten, potential Northern goshawks, possible Canada lynx, elk, returning Gray wolves, Neotropical songbirds, Great Gray owls, Three-toed woodpeckers, and many other species from significant degradation or loss of their habitat in this relatively intact forest. There is an inadequate range of alternatives, offering no choice to avoid many planned impacts to wildlife, recreation, carbon storage, and headwaters of Chinook salmon, Steelhead trout, Redband trout, and Bull trout habitat. Blue Mountains Biodiversity Project can only support No Action (alt. A). We are highly skeptical that there is any ecologically sound reason to log in this area.

Specifically we strongly oppose any logging or roading in any of the following areas: *any forest never logged before, *any roadless or undeveloped area, *moist or cold mixed conifer forest, * any forest area with potential wilderness characteristics or suitability, *wildlife connectivity corridors, *old growth and late successional forest, and *on steep slopes.

We are also firmly opposed to: *any logging of trees over 21" dbh in eastern Washington or Oregon, *logging on sensitive or highly erosive soils, * new or "temporary" road building, *stream crossings for timber removal, *any clearcutting or virtual clearcutting (eg. "seed tree", "shelterwood" or large "group openings" logging), *allowed sedimentation of streams, *fuel reduction and prescribed burning in moist or cold mixed conifer forest or in undeveloped or roadless areas, *elimination of Englemann spruce and Subalpine fir by logging or prescribed burning, and *management of the forest through Forest Plan amendments (planned violations of the Forest Plan.) All of these detrimental activities are planned under proposed action alternatives for the South George timber sale.

We find the Forest Service's alleged reasons for this large and lucrative timber sale to not be credible. The area is mostly higher elevation back country, not near any communities, with numerous fuel breaks as the drier forest is largely concentrated in drainages, so reduction of wild fire risk simply doesn't apply, especially as much of the more concentrated forest appears to be moist or cold mixed conifer that naturally would burn as mixed severity or stand replacement fire infrequently. We question the insect and disease rationale, which is identified as "high levels of insect and disease susceptibility." How are high levels of insect and disease susceptibility determined and defined? What specific scientific studies and site-specific evidence was used to make this determination? What was the basis for this science, regarding forest type, forest conditions, and specific geographic location and plant association groups studied?

How are these forests determined to be "overly dense"? Were different plant association groups judged differently, or not? Dense forest can only indicate deteriorating ecological integrity if the forest is not naturally dense in that successional stage. What proof does the Forest Service have of this regarding the South George project area? *Please send us print copies of the studies cited on p. S-1, last paragraph: Egan and Howell (2001), Holling and

Meffe (1996), and Kaufmann et al. (1994).

It is important to recognize that the historical range of variability is a fluid concept, an approximation, and not set in stone. Different tree species compositions or successional stage percentages from modeled simulations does not mean that the ecosystem is in a state of disequilibrium or “disorganization” that needs to be “cured” by logging. This is inaccurate use of the science and reflects imbedded agency bias towards logging, not professional integrity. The limits of the historical range of variability are human-defined (especially with models!), not natural law. Nature loves chaos, not homogenization. Natural disturbances are just that, natural, and lead to greater biodiversity. Many species and nutrient recycling essential to fertile soils of various types depend on high levels of tree mortality, including high levels of down wood and snags. Removing these so-called “high fuel loadings” across the board, no matter what the circumstances of different plant associations, moisture levels, and native species associations, is a recipe for ecological devastation, not equilibrium or forest health.

How much fire suppression has actually occurred within the project area or adjacent to it, and how successful has it been? Late seral species naturally develop over time and should not be “prevented” or significantly reduced with logging just because they are “late seral” and may be more vulnerable to fires or insects naturally. The time should be long past that the Forest Service’s perceived mission is to rip out existing trees and forest cover that exist naturally and try to replace them with timber industry preferred tree species by clearcutting or virtual clearcutting and re-planting, yet that is what this project proposes to do by eliminating Grand fir and Englemann spruce and replanting with Ponderosa pine, Western Larch, and Douglas fir. This is an old and out-dated strategy quite obvious to anyone who has been monitoring the Forest Service in eastern Oregon or Washington over the last two decades, as we have. Yet the Forest Service is willfully mis-leading the general public in the South George DEIS by pretending these plans have to do with an invented ecological imbalance in moister and never logged forest.

“Over-stocking” (not an ecological concept) relative to what? Different forest types and plant associations naturally vary in tree density and the proportion of shade-tolerant tree species. Since structural stages are not fixed conditions, but change over time, the following rationale by the Forest Service for logging in dry forest sites (apparently to excuse logging of large Ponderosa pine and Douglas fir) is laughable at best:

“Dry forest sites currently support too much of the understory reinitiation structural stage and too little of the stand initiation and young forest multi strata structural stages.”

The Forest Service here fails to consider how these structural stages were created by past logging and natural succession and what this suggests about plans to log more.

We reject management through Forest Plan amendment, which effectively moots the existing Forest Plan, the only source of standards and guidelines, however weak, to protect the viability of wildlife species, ecological integrity, and other values of the forest such as recreation. If dry upland forest late-old structural stages are within HRV, there is no excess number of large trees or late and old structure beyond historical conditions, and thus no need to log large trees or within late and old structure forest in this biophysical environment. This situation does not prompt the necessity of a Forest Plan amendment to violate Forest Plan standards and guidelines. A Forest Plan amendment does not bring the action of logging large trees or late and old structure forest in this situation into consistency with the East side screens or the Forest Plan. Further, any such Forest Plan amendment would not be an “insignificant” amendment in that there is a well documented deficit in both large trees and late and old structure forest throughout

the region due to just such logging as the Forest Plan amendment is supposed to justify. This kind of Forest Plan amendment also has long-term effects of removing large tree structure (existing and future live large trees, large snags, and large logs) from the ecosystem--structure that otherwise provides old growth forest conditions for old growth forest-dependent wildlife. This large structure would take over a century to grow back--truly a long-term and significant loss.

How can moist forest types have “too much” Grand fir and spruce-fir cover types? The three bullet point “issues, concerns, or opportunities” regarding moist forest sites stated on DEIS p. S-2 represent a gross and blatant misuse of HRV to excuse logging of LOS and never-logged areas. Given the regional deficit in old forest and large trees, there can’t be too much old forest. Apparently after logging multi-strata canopy old forest into single stratum canopy (probably based on an original agency argument that there was too much multi-strata old forest), now the Forest Service feels compelled to claim that there is too much old forest single stratum and not enough multi-strata old forest, continually manipulating the proportion of structural stages in whatever direction that could conceivably justify more logging. In this case the Forest Service also manages to find a need to log the structure currently under HRV--accomplished by amending the Forest Plan. We are well aware that the Forest Service is under Region 6 direction to use Forest Plan amendments to clear away any obstacles to more logging, yet the public is not aware of this politically and economically motivated machination, so the DEIS is effectively deceiving the public by not disclosing this motive for their proposed Forest Plan amendments. We are opposed to logging large trees and late and old structure forest regardless of whether it is considered above, below, or within HRV, as HRV is being manipulated by the Forest Service to mask the changes in forest structure and the overall regional deficit in large trees and late and old structure (or “old”) forest.

How were “normal levels” for defoliators defined? How is HRV even known for defoliating insects and root diseases? What kind of evidence is there for this, from where exactly, and from what years? All of these defoliating insects and root diseases naturally fluctuate and have positive ecological roles in the ecosystem--such as thinning the forest, part of the purpose and need identified for this project. When will the Forest Service step back and let natural disturbances fulfill their ecological roles to maintain balance in the ecosystem, rather than continually intervening and further impairing forest ecological functioning?

How is more planned logging and fire suppression going to help altered fire regime condition classes, given that these were the causes identified for the current altered condition? Apparently the Forest Service has not learned from Einstein that repeating the same mistakes does not lead to different results. How is it determined that moist forests in the project area historically had “low to moderate severity” fire? (DEIS p. S-3) Why does the Forest Service assume that without “treatment” (i.e. logging and burning) the project area would inevitably transition to a significantly altered fire regime and greatly increase in fuel loading, tree density, and canopy layering? (DEIS p. S-3) Could this be due to that being the natural state of moist forest? Or is it due to continued fire suppression and insect and fire prevention efforts on the part of the Forest Service? Certainly the forest is not dependent on the Forest Service to achieve ecological equilibrium. Defoliating insects, wild fire, and root diseases all have natural roles in thinning and diversifying the forest and would eventually play these roles without human intervention. Nature is not committing eco-cide. For the moist forests in the project area, over 80 years between fires is not likely outside the historical range of variability--especially as the Forest Service admits that these are dominated by Grand fir and spruce-fir forest cover.

As the majority of acres (about 18,700 acres) in the project planning area are Forest Plan management allocations with “big game” and wildlife habitat goals (C3, C3A, and C4) (DEIS p. S-3), wildlife habitat and elk and deer management goals should take precedence over logging and burning. How does the Forest Service plan to increase old forest structure by logging it, including logging out large trees over or equal to 21” dbh? The Forest Service needs to disclose the scientific controversy over the use of Fire regimes and condition classes and the use of logging to reduce fire risk, and consider other approaches to forest management.

The presumed “need” to provide sawlogs artificially narrows the purpose and need by defining the need as for sawlogs rather than for local employment and by neglecting to recognize that this is a time of both very low to non-existent timber demand (a good time for re-directing forest management to ecologically sound restoration rather than adding to the deficit of large trees and late and old structure forest) and that there are natural limits to “logging to infinity” or unsustainably logging large trees and late and old structure despite shortages in both. Wildlife habitat needs are not being met by using Forest Plan amendments to allow logging of late and old structure forest and satisfactory cover for elk. Why do elk and deer count more as “wildlife” with needs than more rare Management Indicator and listed species such as American marten, Northern goshawk, Canada lynx, Gray wolf, and Pileated woodpecker? As with the Fish and Wildlife Service, apparently the Forest Service is primarily driven by economic values to the exclusion of all the other National Forest values and multi-use such as primitive recreation and spiritual needs. Many of the issues identified on p. S-4 should have been analyzed as key issues which were not, including: TES and MIS Fish Habitat, Wildlife habitat--TES, MIS, Landbirds, and Dead Wood, Potential Wilderness Areas, and Undeveloped lands.

Alternatives:

Thinning for the purposes stated under “Purpose and Design” on DEIS p. S-5 does not apply with scientific accuracy to moist forests the same way it may for dry forests, yet no distinction is made though most of the project area consists of moist mixed conifer forests. So-called “regeneration treatments” (i.e. clearcuts and virtual clearcuts) have no legitimate ecological restoration role and subject the forest to a shock treatment of devastating impacts. We are strongly opposed to both reducing forest density and changing tree species composition in the naturally moist mixed conifer forest of the project area and to any clear-cutting or virtual clear-cutting (eg. seed tree or shelterwood cutting.) Reducing fuel loading in naturally denser, moist mixed conifer forest and removing surface, ladder, and canopy fuels in such forest is also a misuse of the science that really pertains to dry Ponderosa pine-dominant forest and would significantly degrade or eliminate the suitability of moist mixed conifer forest for the species adapted to such moister, denser forest, including American marten, Pileated woodpecker, and American Three-toed woodpecker, all Management Indicator Species for the Umatilla National Forest. If there is no substantive protection for Management Indicator Species designated to monitor and protect particular habitat conditions for a whole suite of wildlife species that require similar habitat structure, then the purpose and need of the Forest Plan under NFMA is essentially mooted, as MIS were designed to set environmental protection boundaries under the Forest Plan to ensure the viability of native vertebrate species and ensure biodiversity and ecological integrity. The South George project planning demonstrates flagrant disregard for the Forest Plan by contributing to the loss of viability of MIS cumulatively and directly and through the use of Forest Plan amendments (by definition, exemptions to allow violation of the Forest Plan) to allow such logging and fuel reduction in inappropriate forest plant association and structural conditions, aided by misleading the public through inaccurate use of science.

Why is the Forest Service not choosing the most environmentally benign alternative or one responsive to public concerns (eg. re: roads, old growth forest, etc.) as their preferred alternative? The Forest Service does not have adequate funding to maintain the current system of roads and should be decommissioning any redundant or ecologically destructive roads with any project and not build any more, “temporary” or not. Funding should be re-directed to real restoration, not more destructive logging and roading. Drop moist mixed conifer forests from logging, fuel reduction, and burning. The Forest Service needs to adapt to current realities of substantial degradation of the forest from past and ongoing timber sales, livestock grazing, and roading, and not perpetuate these problems through more of the same, but instead shift their mission to non-extractive passive and active restoration such as decommissioning roads.

Don’t focus fuel reduction on canopy fuels except where dry, Ponderosa pine-dominant, already logged forest shows definite stress from competition due to past logging and fire suppression-- then in those situations, only remove overly dense young to mature trees (generally less than 6” dbh to 10” dbh maximum), not overstory mature or old growth trees.

Other types of wildlife habitat should be provided and maintained as such, not just for elk and deer, but also denser forest with more down wood and snags for Pileated woodpeckers, American marten, American Three-toed woodpecker, Northern goshawk, and other dense forest and/or high levels of down wood-associated species.

Based on Table S-2 and many other tables and figures in the South George DEIS, there is very little difference between action alternatives, with no “restoration only/no commercial logging or roading” alternative offered.

We support the decommissioning of system, closed, and unauthorized roads and ATV trails as proposed in Alternative C (or more decommissioning) but want to see this combined with much less or no logging, including no logging in never-logged or undeveloped/unroaded areas, and no logging in moist forests or old forests.

We support the no clearcutting provision in Alt. D, but consider seed tree cutting virtual clear-cutting and unacceptable. We support full protection of late and old structure in moist forests and Dedicated old growth areas and also want to see no logging of mature trees equal to or greater than 15” dbh regardless of location or forest type due to the regional (Blue Mountains) deficit in trees greater than 15” dbh due to decades of over-logging the largest trees available. Further, we want to see less overall logging than proposed in Alt. D by eliminating helicopter and skyline logging (avoiding excessive cost and erosion on steep slopes) and any logging in undeveloped, moist, or cold forest.

Define “improvement” cut and “low” thinning. The concept of “intermediate harvest” is outdated as it assumes ultimate clearcutting, which has no ecological merit and causes severe ecological impacts, including significant loss of biodiversity through homogenization of the forest.

Re: Alternatives Considered but Eliminated from Detailed Study:

Looking at the aerial photos provided in the DEIS, it is evident that areas of trees are greatly broken up and separated by large areas of non-forest grassland--natural fuel breaks as well as road fuel breaks. Fire risk is a very minor concern given the back country nature of the project area and the need to move away from fire suppression. The fire risk reduction purpose of the project is not convincing and reflects mis-application of the science regarding site-specific variability and failure to disclose scientific controversy over the Forest Service’s use of Fire Regime Condition Class and over whether fuel reduction logging actually reduces fire risk; whether stand replacement fires are actually increasing in extent, frequency, or intensity; and

regarding the mis-application of fire risk/severity reduction through logging concepts applicable to very dry Ponderosa pine dominant forests to moist mixed conifer and cold mixed conifer forests. The purpose and need for the South George project is so narrowly construed as to preclude other reasonable and desirable options. Ecosystems manage wildlife habitat naturally. Logging is not a necessary or restorative intervention. The Forest Service fails to adequately disclose and analyze the impacts of proposed logging, roading, fuel reduction, and burning.

The rationale for not studying Alternative G in detail, as stated on DEIS p. S-10, artificially narrows the purpose and need to be almost entirely driven by the desire to log, irrespective of all other forest values and any legal constraints, which are jettisoned through use of Forest Plan amendments, misleading public relations rhetoric, and failure to fully disclose potential environmental impacts. Until the Forest Service analyzes in detail such a change in priorities as Alternative G, it will never be considered seriously or implemented in response to public concerns.

We incorporate by reference as part of these comments the enclosed comments hand-written on pages of the DEIS to contextualize our concerns in more detail. Please note that these include requests for hard (print) copies of most of project files cited, including the Biological Evaluation for TES species and most specialist reports. If necessary, you may consider this a Freedom of Information request with our accompanying request for a fee waiver as Blue Mountains Biodiversity Project is a project of the League of Wilderness Defenders, a 501 (c) 3 non-profit organization. Please also send us the detailed large scale map requested on page one of these comments at your earliest convenience, as the information requested is already available (most of it is on the smaller DEIS maps but not necessarily combined in the manner most useful to us) and we would like to go out and look at proposed sale units and see what conditions and wildlife are evident. Location of springs for potable water on the map would also be appreciated. We also incorporate as part of these comments all science articles or excerpts enclosed to support our comments. Thank you for your consideration of our comments. Please keep us advised of all further developments with the South George project, including mailing to us a hard copy of the Record of Decision. We look forward to your timely response with information requested and any response to our questions.

Jaron Gulth,
Director,
Blue Mountains Biodiversity Project