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**Comments on the Ochoco NF proposal to “abate danger trees” in the Bridge Creek fire area**

Bridge Creek Fire Danger Tree Abatement Project  
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The notice (and accompanying map) dated October 24, 2008 for the proposed Bridge Creek Fire Danger Tree Abatement Project has been reviewed by our organizations. The following are the joint initial scoping comments from the Oregon Chapter Sierra Club and the League of Wilderness Defenders – Blue Mountains Biodiversity Project for this proposed project

The Sierra Club represents over 23,000 members throughout Oregon, including the Club’s Juniper Group, which has over 1,000 members throughout central and eastern Oregon. LOWD-Blue Mountains Biodiversity Project has many members and volunteers throughout the Northwest. Sierra Club members feel strongly about nature, wilderness, natural forest ecosystems - including fire ecology and ecological recovery, wildlife, fisheries, and the environment. Sierra Club members regularly enjoy hiking, camping, wildlife watching, birding, ecological study, and photography within the national forests of central and eastern Oregon, including the project area within the Ochoco National Forest. Members and volunteers of the LOWD-Blue Mountains Biodiversity Project regularly use the Ochoco National Forest, including the project area, for hiking, ecological study, watching wildlife, viewing forest native botanical diversity, and avian species study.

Management activities within the Bridge Creek fire area are of significant concern to both of our organizations. Post fire landscapes have significantly different management needs than unburned green forest ecosystems. Management activities must be based upon sound post-fire ecology scientific research, with a baseline emphasis of assisting natural restoration processes. Care must be exercised throughout both activity planning and implementation, ensuring that projects in this area will not result in further impairment of natural recovery processes and/or additional degradation to the ecological integrity and fish and wildlife habitat in and around the burn area. Both the Sierra Club and the Blue Mountains Biodiversity Project have a long-standing and well-documented interest in the management of the Ochoco National Forest, and public lands throughout the region. Our organizations have the following comments concerning the proposal to “abate danger trees” in the Bridge Creek post-fire area:

Forest connectivity including hiding cover continuity is important within the Bridge Creek area, especially given the proximity to the wilderness and adjoining unroaded areas, and given the cumulative impacts of the fire and past management. As such it is imperative that any felling and removal of mature and old large diameter trees be limited to those that actually pose verifiable danger to essential publicly

frequented open system roads. It is important that only two area roads are planned for danger tree removal, and that little used spur roads are not part of this proposal. It is important that agency provisions allowing trees greater distant than 1 tree length to be felled be used only where there is a verifiable potential that such trees could actually reach the roadway, through bounce or slide where they are located upslope of the road. Where trees are located downslope, these generally have little actual potential to reach the roadway when they are more than one tree length distant, and as such they should be retained.

Similarly, trees leaning away from the road with little potential to fall into the roadway, even where they are in relative close proximity, should be retained. Broken top large snags generally stand far longer than full snags, and also should be retained.

Trees that have either already been felled or have fallen and are lying on the forest floor can no longer be considered “danger” trees, as these can no longer fall upon area roadways. Large diameter fallen trees should be retained as downed logs, helping provide one of the essential components of recovering natural postfire forest ecosystems. Fallen trees are in a long-term process of decomposition. Forest ecosystems and ecological functioning depend upon decomposing fallen trees. These supply nutrients to forest soils, replenishing subsoil minerals and sustaining innumerable subsurface soil fungi and microbial organisms that perform irreplaceable roles in the growth of healthy trees and recovery and long-term viability of forest ecosystems. Scientific research has confirmed and documented the essential role of large downed logs in sustaining healthy forest ecosystems.

Fallen large diameter logs are also habitat for numerous biodiverse forest species, from essential microbes and fungi, to insects (carpenter ants, termites, millipedes, pill bugs, hymenoptera such as yellow jackets, etc.), to burrows, dens, middens, and refuge for mammals ranging from ground squirrels and chipmunks to pine marten, coyotes, and even bears in some instances. Numerous species including woodpeckers, wasps, bears, native forest birds, raptors (including goshawks, other hawks, and owls), pine marten, wolverine, bobcats, and others; all depend in some part upon prey species that utilize fallen large diameter logs as habitat for propagation, refuge, and/or sustenance, etc.

Large logs can help provide hiding cover and refugia for many wildlife species, especially when located in more open postfire environments and near roadways. Where available large downed logs are lacking, some of the danger trees could be relocated and utilized for wildlife habitat, watersystem recovery, and slope stabilization, and soil nutrient sources.

Large downed logs also play important roles in stabilizing forest soils, which are subject to continual erosion from rainfall, snowmelt, and runoff. Postfire environments are highly susceptible to soil erosion, including the loss of vegetative seeds during runoff events. It is often in soils held by fallen large logs, where many wash runoff seeds and sediments accumulate, that the first returning vegetation takes root, from there to spread over time to less stable soils, thus beginning the natural recovery process in postfire areas.

Where feasible, large standing snags should be left if they are likely to remain standing for 5 to 10 years or more. Where large diameter trees are in close proximity to the road and likely to fall within the next 5 years, some of these could be directionally felled away from the road, and left within the forest to help meet natural resource needs.

Large diameter logs play extremely important roles in forest hydrological and aquatic systems. On forest soils and slopes they slow and absorb runoff, allowing more moisture to be retained for longer periods of time. Absorbed moisture is slowly released into soils and air during the dry season, with many biodiverse species dependent upon moisture retained within and underneath large downed logs. In forest

streams they help stabilize stream banks, minimize sedimentation, help aerate water passing over them, provide habitat and additional sustenance for numerous biodiverse species that are essential components of the aquatic and forest “food chain,” create pools used by aquatic species for propagation, foraging, refugia. Large downed logs in waterways and seasonal water drainages help slow water runoff, minimizing peak flows and sediment loss, while providing habitat, cover, and the accumulation of cool deeper pools, and aerated waters.

Recognizing the importance of downed large logs to forest ecosystems, Pacific Northwest Region eastside national forests’ Land Resource Management Plans were amended by what is has become known as the “eastside screens.” These amendments contain a series of provisions and directives for interior forest-dependent wildlife species of concern, to ensure their continuing viability. Due to the significant reduction of old growth forests over the past century from excessive logging, many old growth dependent species were documented as experiencing serious declining population trends. Eastside screen provisions are intended to prevent further population declines, including preventing the loss of additional old growth habitat. Overall objectives are to restore and recover old growth forest habitat to within the historical range of natural variability, and thus, it is hoped, also provide for the continuing viability of biodiverse dependent species of concern, as well as the long-term sustainability of the region’s natural forest ecosystems.

Eastside screens provisions set minimum standards for the distribution and retention of large downed logs per acre. These minimums are tree species and forest plant association group specific. For ponderosa pine they are reported to be: 20 to 40 linear feet per acre, minimum 6 feet in length, minimum diameter on the small log end of 12”, with 3 to 6 log sections per acre; for mixed conifer they are: 100 to 140 linear feet per acre, minimum 6 feet in length, minimum diameter at the small log end of 12”, minimum of 15 to 20 log sections per acre; for lodgepole pine: 120 to 160 linear feet per acre, minimum length of 8 feet, minimum diameter at the small log end of 8”, with 15 to 20 log sections per acre. Scientific research cautions that managing for minimum habitat requirements rather than optimum is insufficient to reverse declining population trends for affected species of concern, and restore species populations to viable sustainable levels. Where feasible, danger trees in excess of resource needs could be utilized elsewhere to help meet resource recovery and habitat objectives.

Additionally different management designations reflect differing management objectives and focus specific to environmental resource concerns and long-term goals. The Bridge creek fire area encompasses different management designated areas. Project planning should be consistent with the differing management focus for designations along the road prisms for roads 450 and 459.

It is important to maintain forest structural integrity throughout the area’s roadsides as possible, avoiding excessive felling of trees that would otherwise extend the road prism up to an additional 150 foot wide clearcut on each side of these roadways. Excessive roadside cutting elsewhere has detrimentally impacted available wildlife hiding cover and habitat, de-stabilized roadside soils resulting in erosion and sedimentation to area watersystems, impaired vegetative recovery by harming subsurface soil communities and introducing and spreading invasive exotic species, and generated excessive amounts of slash debris requiring soil damaging pile burning or costly removal.

Given all of the above, it is important that agency objectives to expedite this project to recover the economic value of felled danger trees be subservient to the need to meet ecological standards and objectives for this postfire area. Rather than just view the felled logs as a potential economic boon to timber interests, balance this with the realization that felled “danger” trees also represent an opportunity to accomplish natural resource protection, recovery and restoration objectives. We suggest the following analysis and project design resolutions:

- A. Retain at least the minimum eastside screen standards for large downed logs per acre throughout the affected project area;
- B. In RCHAs, RNAs, designated old growth areas, areas of ecological concern (steep slopes, sensitive plant locations, connectivity areas, areas with obvious wildlife use, etc.), and near all closed, unused, non-passenger vehicle, and remote spur roads, and user-created OHV trails; retain all large downed logs;
- C. Retain felled trees where recovering forest vegetation would be lost if these were hauled from the area;
- D. As this is a postfire area, prioritize restoration needs, utilizing felled large trees for needed slope and soil stabilization, riparian area stabilization and recovery, and to meet large downed log standards in adjacent areas;
- E. Where OHV abuse and user created trails exist that should be closed to protect and maintain natural resource objectives, use some of the large downed logs nearby to assist in blocking trails and to accomplish needed restoration from OHV abuse;
- F. Where livestock grazing has damaged vegetation, soils, and/or riparian areas (including denuded/trampled/collapsed stream banks, head cuts, sensitive plant or habitat areas, etc.), utilize some nearby large downed logs for resource recovery and protection;
- G. Where aquatic habitat restoration would benefit, use some of the large downed logs for bank stabilization, upslope soil erosion prevention, sediment traps, and instream pools;
- H. Restoration needs resulting from fire line impacts should be assessed. Felled trees locally available should be utilized to stabilize fire-line exposed soils and restore these areas;
- I. Where existing invasive exotic plants are located, or where high potential exists for new introduction of invasive exotic plants, leave medium and large diameter felled danger trees in place, and avoid harmful soil disturbance;
- J. Where all of the above have been reasonably incorporated and accomplished, additional felled logs in excess of the requisite screen specified numbers per acre and of restoration and protection needs, that are within general forest management areas within one tree length or less (150 feet maximum) of these two open designated roads could be utilized as originally proposed for economic recovery objectives;
- K. Where logs are to be hauled, effective provisions and monitoring must be implemented to ensure natural resources are protected, including avoiding harmful impacts to area soils, recovering vegetation, waterways, and preventing the introduction and/or spread of exotic invasive plants.

If the proposed project meaningfully incorporates the above issues and concerns, and is conducted utilizing ecologically responsible methods, it likely could move forward relatively quickly. Otherwise, to the extent the project focus is on economic objectives at the sacrifice of ecological needs, an EA should be conducted. If other management actions are planned in the same area, or as part of the same overall postfire management, these should be combined in an EIS for related burn area management projects. If the latter, cumulative and direct impacts to wildlife, soils, aquatic species and waterways, area vegetation, and long-term restoration objectives must be addressed for the totality of management actions in this area, if indeed other actions are also being planned.

Our organizations are concerned for the long-term ecological recovery of this postfire area. We offer to assist the agency in assessing post-fire management projects that both help to restore the areas forests and watersheds, and address management and travel concerns. We look forward to reviewing the project proposal concerning danger trees and other management actions planned in the greater project area.

For the Natural Heritage of Us All,

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