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First name: Kent

Last name: Coe

Organization:

Title:

Official Representative/Member Indicator:

Address1: 103 2nd St

Address2:

City: La Grande

State: OR

Province/Region:

Zip/Postal Code: 97850-1111

Country: United States

Email: kcoe@eoni.com

Phone: 541 962-7049

Comments:

Restoration and resiliency are two terms that the USDA had to come up with to account for the fact that they screwed up! Most of the places proposed for treatment are in previously logged, previously managed forests and grasslands. So the question begs itself: will this proposed action be any different than previous actions? Certainly the scope of the proposed action is huge, way larger than anything heretofore seen. Usually the proposed action and subsequent NEPA documentations are done on a district or National Forest level. Here the action is massive--across four National Forests! So the question becomes: how is the Forest Service going to do things differently this time, to avoid the problems the Forest Service caused from the last time? There doesn't seem to be any mention of how to do that.

I will address a couple concepts, and focus on, as well as use the numbers, on the Wallowa-Whitman National Forest. The comments could be applied to all the forests included in the "notice of intent to prepare an environmental impact statement" NEPA documentation. The concepts to address are grazing, wildfire, invasive species management, and Wilderness or roadless areas. I've included many of the references at the end, so you can be assured I am not drawing from personal opinion.

It is stated that:

"No treatments are proposed in any area that is within an existing, active project planning area, a recently burned or implemented project area, Wilderness, Research Natural Area, Inventoried Roadless Area" Shouldn't areas that have recently burned, or even, Wilderness Areas be treated? The concept that nothing will happen in a Wilderness Area is really not based on reality. Noxious weeds, invasive plants, and cattle all impact Wilderness Areas and recently burned areas. Work must be done in them. To exclude those areas will only cause additional havoc.

Also in the "Notice" is the following:

"7,200 acres in larger diameter, open dry forests to restore desirable fire regimes, and encourage growth in average diameter without reducing the abundance of large tree, open canopied stands overall "

This sounds like you are going to cut large trees. You say you won't reduce the abundance of large tree, open canopied stands. That sounds like you will cut large trees. I think the concept should be that you will cut small trees in larger diameter forests to try to eliminate ladder fuels, and enhance the survivability of the larger trees (Stephens et al. 2009).

It is written in the Notice,

"15,000 acres for grassland restoration"

What could the Forest Service possibly do to restore the native grasslands on the Wallowa-Whitman? How is the Forest Service going to treat 15,000 acres? Is the Forest Service going to remove domestic livestock from 15,000 acres (Beschta, et al. 2013)? Awesome! Is the Forest Service going to burn that many acres? Will the Forest Service plant that many acres? Just this number, 15,000 acres, seems like a huge area, and it is only one very small piece of the whole. How will the Forest Service alter the grassland landscape to provide habitat for bluebunch wheatgrass, Idaho fescue, and Sandburg's bluegrass and somehow eliminate the ventenata, medusahead and cheatgrass? This, in and of itself, is a tall order.

Fire suppression. It seems that every winter the USFS announces that they are going to return fire to the ecosystem. And then when summer comes along, there is an all out effort to suppress any and all wildfires,

including those in Wilderness Areas. In the past couple of years the Forest Service has suppressed perfectly fine wildfires in Hell's Canyon Wilderness Area, Eagle Cap Wilderness Area and the Wenaha-Tucannon Wilderness Area. These would have been good places to let fire run its course as they had done for hundreds of years before Euro-Americans arrived on the scene (Frost 1998, Fule, et al. 2012, Stephens and Ruth 2005, Swetnam & Baisan 2003). Neglecting Wilderness Areas is a form of management, and may very well go against the intent of the Wilderness Act of 1964. The Wilderness Act says: "protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable" From the Wilderness Act (1964). Wilderness should be managed to preserve its natural conditions. By suppressing wildfires young trees grow up creating dense stands of trees that did not exist before Euro-Americans started goofing things up. A prime example of the mismanagement along these lines is the Wenaha-Tucannon Wilderness. All of the trails that are along the south boundary of this Wilderness, Timothy Springs, Elk Flat, Cross Canyon and the Hoodoo Trails all go through forests with high density of trees that are all younger than 100 years, about the time fire suppression started. Bring back the fires. Let the wildfires burn in Wilderness Areas.

I would hope that any document the Forest Service should produce for this planned project would provide the documentation that shows the proposals have been tried and were successful in other places. Research showing that the planned restorations/resiliency projects could work in this instance should be indicated in the document. If there is no research showing that thinning, or logging, or burning would enhance the resiliency of the forest, then it probably shouldn't be done.

Respectfully,  
Kent Coe

Act, Wilderness. "Public Law 88-577." Act of September 3 (1964) 16 U.S.C. 1131-1136.

Belsky, A. Joy, and Dana M. Blumenthal. "Effects of livestock grazing on stand dynamics and soils in upland forests of the Interior West." *Conservation Biology* 11.2 (1997): 315-327.

Beschta, Robert L., et al. "Adapting to climate change on western public lands: addressing the ecological effects of domestic, wild, and feral ungulates." *Environmental Management* 51.2 (2013): 474-491.

Dodson, E.K. and Fiedler, C.E., 2006. Impacts of restoration treatments on alien plant invasion in *Pinus ponderosa* forests, Montana, USA. *Journal of applied Ecology*, 43(5), pp.887-897.

Frost, Cecil C. "Presettlement fire frequency regimes of the United States: A first approximation." *Fire in ecosystem management: shifting the paradigm from suppression to pre-scription* (TL Pruden and LA Brennan, Eds). Tall Timbers Fire Ecology Conference Proceedings. No. 20. 1998.

Fule, P.Z., Crouse, J.E., Roccaforte, J.P. and Kalies, E.L., 2012. Do thinning and/or burning treatments in western USA ponderosa or Jeffrey pine-dominated forests help restore natural fire behavior?. *Forest Ecology and Management*, 269, pp.68-81.

Noss, Reed F., et al. "Managing fire-prone forests in the western United States." *Frontiers in Ecology and the Environment* 4.9 (2006): 481-487.

Stephens, S.L., Moghaddas, J.J., Edminster, C., Fiedler, C.E., Haase, S., Harrington, M., Keeley, J.E., Knapp, E.E., McIver, J.D., Metlen, K. and Skinner, C.N., 2009. Fire treatment effects on vegetation structure, fuels, and potential fire severity in western US forests. *Ecological Applications*, 19(2), pp.305-320.

Stephens, Scott L., and Lawrence W. Ruth. "Federal forest-fire policy in the United States." *Ecological applications* 15.2 (2005): 532-542.

Swetnam, Thomas W., and Christopher H. Baisan. "Historical fire regime patterns in the southwestern United States since AD 1700." (1996): 11.

Swetnam, Thomas W., and Christopher H. Baisan. "Tree-ring reconstructions of fire and climate history in the

Sierra Nevada and southwestern United States." Fire and climatic change in temperate ecosystems of the western Americas. Springer New York, 2003. 158-195.