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***Comments on the Proposed Galena Project***

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The Oregon Chapter Sierra Club and the League of Wilderness Defenders-Blue Mountains Biodiversity Project have reviewed the March 12, 2009 notice for the proposed Galena Project. The Sierra Club represents approximately 20,000 members throughout Oregon, including the Club's Juniper Group, which has over 1,000 members throughout central and eastern Oregon. Sierra Club members feel strongly about nature, wilderness, natural forest ecosystems, wildlife, fisheries, and the environment. Sierra Club members regularly enjoy hiking, camping, wildlife watching, birding, ecological study, photography, natural solitude, and recreation within the national forests of central and eastern Oregon, including the Malheur National Forest Galena Project area. LOWD-Blue Mountains Biodiversity Project has many members and volunteers throughout the Northwest. Members and volunteers of the LOWD-Blue Mountains Biodiversity Project regularly use the Malheur National Forest, including the Galena Project area, for hiking, ecological study, watching wildlife, viewing forest native botanical diversity, and avian species study. The proposed Galena Project would adversely impact the environment of the greater project area forests, significantly harming the interests of the members and volunteers of both of our organizations.

***Though only in the scoping period, the proposed Galena Project is largely already developed, with a map of logging unit and management action locations accompanying the scoping notice.***

The proposed Galena Project appears to be a new name cobbled over the defunct old Vincent Vinegar and Blue timber sales proposed over a decade ago, and pulled from further action due to significant ecological and legal issues. Vincent Vinegar was a planned timber sale from the mid-1990's that the agency withdrew long ago in-part in response to our legal/ecological issues at the time. Our organization's hiked and surveyed all of the then proposed units, and the surrounding area forests, and found the area to be a mix of logging impacted areas and old growth and mature mixed conifer forest, with alot of old growth firs in the area's forest watershed tributaries (Vincent and Vinegar Creeks, etc.) to the salmonid Middle Fork John Day River.

Reportedly, Blue Mountain Forest Partner's lengthy and contentious collaborative processes pushed county and timber reps to push the Malheur NF to re-propose Vincent Vinegar as Galena as they wanted to use the already existent (but out-dated and scientifically archaic) NEPA analysis to quick jump-start this timber sale, with the intent of getting through the NEPA process faster. As such the current scoping phase NEPA notice for Galena arrives replete with planned logging units but little else in the way of

meaningful environmental disclosures and little evidence there will be ample compliance with NEPA's requisite meaningful public involvement in project development, especially when this proposed project is largely preconceived and contrived already. Misuse of NEPA process, utilizing outdated analysis, archaic science, and inaccurate site-specific conditions to circumvent NEPA analysis and meaningful public involvement requirements, the use of credible contemporary science pertaining to mixed conifer/mixed fire severity forests in the inception and development of proposed forest management actions, will make for a contentious NEPA legal process from the onset. Instead, we recommend the agency withdraw this pre-conceived scoping notice, and re-issue a revised scoping notice that informs the public of the site-specific conditions of the area, the watersheds and salmonid water-quality concerns where the project is located, the species of concern that are or may be in the area, and the range of scientific recommendations and controversy on possible management actions in the analysis area, as well as potential cumulative impacts concerns in the greater area. At this stage of project analysis, there should be no already developed logging units and action plans – as no analysis nor meaningful public involvement has been conducted to justify the foundation and development of such plans.

The notice alludes to collaborative group support for the Galena project, however, conservation representatives to the BMFP group are clearly not in agreement. Instead, it is largely just the USFS, county, and timber reps pushing this revived old once dead timber sale inanity. Indeed Galena as planned legally and ecologically has about as much momentum and viability as the heavy metal it's named after, and reliance on archaic old timber sale plans and units will be about as toxically fatal to agency plans. We seriously and respectfully request a new, legally compliant NEPA scoping notice and comment period for this poorly contrived project. We also request that the agency conduct a full EIS for the proposed environmentally significant actions, as an EA is clearly insufficient given the scale, scope, and extent of environmental and social issues of the proposed project.

***Project location:*** “The Galena Project is located on National Forest lands in Grant County, Oregon, about 2 miles west of Bates, OR.” The scoping notice does not give any information on watershed location specifics other than the accompanying map, which shows the location to be on both sides of the Middle Fork John Day River. Proposed logging units are located along Vinegar creek, Vincent Creek, Blue Gulch, Little Boulder Creek, Hunt Gulch, Windlass Creek, Tincup Creek, Deerhorn Creek, Davis Creek, Placer Gulch, and other unnamed creeks and tributaries in the 38,200 acre proposed project area.

The notice claims that the Galena Project proposal “addresses current fire hazard and forest health needs of the area, including reduction of both hazardous fuels and bark-beetle risk. It is the product of local collaborative processes, early public participation, and interdisciplinary design. The project would involve approximately 2,800 acres of precommercial thinning and fuel treatments, 6,900 acres of commercial harvest and fuel treatments, and approximately 24,100 acres of prescribed burning within a project area of 38,200 acres. Integrated conservation measures are provided for cultural or historical sites, soil, water, fish, wildlife, range, native plants and trees, scenery, and recreation.”

Despite having progressed to a point pre-public scoping involvement where the agency has already drawn logging unit location boundaries, the notice does not disclose any natural resource concerns in the greater area, including ESA and/or Oregon State listed species and/or regional species of concern and indicator species, listed and rare native plants, or issues with invasive exotic plants. Neither does the notice disclose allotment locations or address any possible allotment closures or deferments during and post project.

***The proposed Galena Project, according to an enclosed table, involves:***

- Commercial logging-thinning across 5,000 acres of forest,

- Logging conversion to early seral forests on 1,350 acres;
- Ground disturbing tractor logging and/or skyline logging throughout the project;
- Construction of several temporary roads (of unspecified number or miles other than “short”);
- Unspecified new road construction, and unspecified road maintenance miles;
- Pre-commercial thinning on 2,400 acres,
- Burning across 24,100 acres,
- Commercial logging actions across 25 aspen stands;
- Potential future logging in steep areas dropped from the current plans due to helicopter logging economics;
- Biomass utilization and/or piling and burning of logging slash;
- Log deck landings in some RHCAs, but not logging in RHCAs;
- Provisions for some log skidding on slopes up to 45%;
- Forest Plan amendment to reduce satisfactory cover on 128 acres below plan standards, and another amendment to increase the size of old growth areas to meet Forest Plan minimum standards;

***Proposed “Purpose & need:”***

- 1. “Improve forest health and move towards fire-adapted ecosystems.
- 2. Reduce the fire hazard (including surface fuels, ladder fuels, and crown fuels) within the urban interface on National Forest lands.
- 3. Create stand conditions that reduce the chances of a ground fire becoming a crown fire, and a small fire becoming an uncharacteristic wildfire. This will not only help protect life and property on both private and public lands, but will also increase the safety for firefighters.”

***Proposed Need for Action:***

- A. “A majority of the timber stands in the Galena project area are overstocked, contain excessive surface and ladder fuels, and in some cases the species composition has shifted towards more late seral species (fir) instead of the early seral species (pine and larch) that replicate historical forest conditions.
- B. There is also a need for aspen restoration, to reduce conifer competition and grazing. “

**The Proposed Galena Project must be consistent with pertinent scientific research and must meet the analysis requirements of the NEPA**

The analysis for this project must address inherent flaws, omissions, and assumptions in the above “purpose and need” objectives. Among these are:

- ***Purpose and need 1:*** Forests of all types within central and eastern Oregon’s fire-ecology forests are by nature are “fire-adapted ecosystems.” Forests of the region evolved with fire as an inherent foundational cyclic component of natural ecological processes, with fire-pattern adaptations varying by plant association group forest composition, elevation, regional and localized climatic patterns, moisture and slope aspect, topographical features, and other dynamic ecosystem features. Forest structure naturally is composed of flammable organic vegetation, including living and dead brush and wood fiber. Fires, including “high-intensity wildfires,” are natural components of forest ecosystems, playing integral roles in facilitating and shaping the overall health and mosaic patterns of the forest. Forest stands throughout much of the proposed project area are mixed severity fire system forests, with fires naturally varying in fire intensity patterns over time, spanning the mosaic range from periodic low severity fires to high severity fires. Without fire, including periodic mixed and high intensity fires, such forest systems would cease to exist. The stated purpose and need # 1 must be further qualified to bring this objective into consistency with the area’s naturally varied ecological cycles and functioning, accurate site-

specific conditions, and with the recommendations of scientific research pertinent to the area's varied plant association community mosaics and mixed fire severity historical patterns.

- ***Fire intensity patterns vary across the landscape.*** A significant portion of the proposed project area is located in naturally varied mixed fire severity forest systems. Even ponderosa pine forests, often purported to be low-severity fire systems, are over time actually on the lower intensity continuum of mixed fire severity systems, and as such occasionally burn severely to fluctuating extents as part of their natural ecological cycles. Mixed conifer forest stands, and the area's overall forest mosaic patterns, are dependent upon naturally fluctuating recurrent cycles that span the range of low intensity to mid and high severity fires. Complex ecological functioning, biodiversity, plant association group mosaics, and overall forest resilience is dependent upon ongoing dynamic natural fire cycle variations in fire severity and extent. Forest pathogens are in-part kept within natural check and balance patterns by fire cycle variations. Essential wildlife habitat quality, including species biodiversity and abundance, as well as variable forest structure including dense stands/hiding and thermal cover, meadow openings, plant abundance, etc. are dependent in-part upon fluctuating natural fire patterns. Soil communities and functioning are dependent in-part upon fire cycle fluctuations which provide nutrients, replenish depleted forest soils, and re-arrange the ever-changing dynamics of forest stand and vegetation compositions and species habitat locations. This purpose and need must be revised to incorporate the ecological realities and scientific research knowledge pertaining to the area's dynamic mixed severity forest stand mosaic compositions. Forests are not static. Objectives should be to work towards the protection and maintenance of natural ecological processes and resilience, which is ever-ongoing within nature. As currently proposed, the planned commercial logging is premised largely upon simplistic scientifically insupportable and ecologically erroneous assumptions. The EIS for this proposed project must responsibly disclose and address the range of scientific controversy pertinent to the area's forest ecosystems, ecological processes, wildlife, and waterways.
- ***Underlying purpose and need assumptions related to "forest health" resilience and old growth:*** Science generally notes that old growth forest structure is dependent upon complex interwoven natural ecological processes; that nature is ever on a course of self-restoration and resilience; and that protecting natural ecological processes and forest conditions is the best management course to maintaining and increasing the abundance of late old structure (LOS or "old growth") stands. Science generally does not support commercial logging as a feasible action capable of attaining the "forest health" and/or the fuels and fire risk reduction purpose and needs above. Old growth structure and "forest health" are not 'products' that can be artificially manufactured by commercially logging and adversely tampering with natural forest ecosystems. Logging and road building fragmentation, soil community disturbance, compaction, and hydrological impairment caused by logging are antithetical to the stated purpose and need objectives of this proposed project. The EIS must disclose the full range of credible scientific research pertinent to this project's ecosystems, ecological processes, salmonid watersystems, and wildlife. The project's developed alternatives must be based upon scientific research. If some developed alternatives are premised on scientifically controversial assumptions and actions, other action alternatives must responsibly and objectively embody the recommendations of conflicting science. Proposed actions must provide verifiable evidence that alternative actions are capable of actually achieving the project's stated goals. NEPA analysis must also disclose scientific research that calls into question the efficacy and basis of proposed actions, so both the public and the decision-maker have the requisite sufficient range of information necessary to meaningfully assess likely and potential impacts of the proposed actions, and arrive at a scientifically reasonable decision.
- ***The notice's "insect and disease mortality" and related "fuels" rationales:*** As with the complexity of dynamic ecological processes noted above, insects and disease and the "fuels" loads

these generate are inherent, beneficial, and necessary components of forest ecosystems. At times even landscape “large-scale infestation” by insects and/or disease may naturally occur across significant portions of forest systems. However, current levels of insects and disease are far from either landscape or large-scale at present, nor have sufficient conditions been identified to credibly ascertain that such widespread levels of insect or disease caused tree mortality is likely at any time in the foreseeable future to occur on a scale that would be detrimental to natural forest functioning, and resilience. Insect and disease levels within area forests are well-within natural variable endemic levels, and are largely very beneficial to forest structure, wildlife habitat, and soil community functioning. The EIS must disclose and assess the applicable scientific research related to natural ecological processes, including insects and disease, and the wildlife and invertebrate species dependent upon forests insect and disease tree pathogens for sustenance and habitat. The EIS must disclose and address applicable scientific research that strongly recommends against commercial logging to influence or “reduce” insect and disease activity and resultant “fuels;” noting that such logging is incapable of achieving the purported goals above, and instead results in significant adverse harms throughout the forest ecosystem that actually can result in exacerbating tree mortality and other impacts of insects and disease. As with fires, natural forest ecological processes bring inherent and fluctuating levels of resilience to the impacts of insects and disease. At times, insects and disease levels must peak to perform needed soil nutrient replenishment; natural stand thinning; changed localized stand and vegetative structure and compositions; boosts to predator species populations, habitat, and sustenance sources; preparing the course for the next ongoing phase of changing forest mosaic cycles and patterns. Mechanical manipulation through logging – other than very limited scientifically controversial small diameter tree and brush removal that is largely of little or no commercial economic value – has been well-proven through a significant number of scientific studies to be severely detrimental to forest resilience, both in the short and long-term. The EIS for this proposed project must disclose and assess scientific research pertaining to insect and disease ecological roles and patterns, and scientifically appropriate management actions.

- ***Aspen and hardwood communities, and RHCA objectives:*** These are best enhanced by addressing the root sources of any current unnatural conditions. First and foremost among these are livestock grazing and changes in hydrological flow patterns caused by water diversions, and unnatural changes to soil and plant communities. Roads also impair and divert both surface and subsurface hydrological flows from prior natural patterns most hardwood communities depend upon. Logging also reduces moisture and nutrient availability, harms complex soil communities, and opens areas to trampling from livestock as well as – to some extent - native ungulates. Management actions in aspen stands and RHCAs must be consistent with credible non-controversial science research and recommendations, and largely must protect and maintain ongoing natural recovery and resilience processes in these areas. Removing livestock from aspen stands and RHCAs for a minimum of ten years is a foundational requisite for hardwood and riparian plant community recovery. Removing road beds located in or adjacent to hardwood stands and RHCAs and restoring hydrological subsurface soil flows can be beneficial. Preventing the introduction and spread of invasive exotic plants, and reducing or removing current invasive plant populations with ecologically benign methods are also essential. Returning diverted waters to affected watersheds, and removing unnatural consumption demands upon available waters – such as livestock – is important to achieving this objective. Restoring natural fire cycles may also help, provided that this does not entail harmful mechanical equipment use and logging in these areas, and providing that livestock are prohibited from burn affected areas for at least ten years to allow sufficient natural soil community and vegetative recovery post-burning. Theoretical “conifer encroachment” in aspen and hardwood community areas generally only feasibly applies to small diameter young trees that may have grown in frequent fire areas since the last local fire. However, most aspen stands and RHCAs, due to inherent moisture abundance and natural fire

mosaic patterns, are actually infrequent mixed and high fire severity areas, and as such naturally had considerable vegetative and conifer growth occurring between less frequent fire cycles. As such, any proposed removal of conifers in these areas must comport with the actual natural range of variability and scientific research pertinent to proposed action locations. The EIS must disclose and address pertinent science and develop ecologically sound action alternatives that address root causes of aspen stand and RHCA impairment, and hardwood community abundance and resilience issues. Action alternatives should not involve scientifically insupportable or controversial logging, machinery, or road building in or near RHCAs or in aspen/hardwood communities.

***The EIS analysis must address the following also:***

- Given the natural dynamic variability over time of forest vegetation and mixed severity fire pattern cycles, to what extent are area forest ecosystems outside of naturally variable patterns and ecological functioning? Are current fire risk patterns and deficiencies of fire resistant large late and old forest structure within area forests the result of past logging, natural or human caused fires and/or fire suppression actions, livestock grazing, other conditions, or a combination of factors?
- Is ongoing livestock grazing contributing to current deficiencies in hardwood plant species and water quality?
- What are the past two century's fire histories (occurrences, natural mosaic fire intensity and extent patterns, suppression incidences and extent of effectiveness, fire causes)? What are the natural ranges of variability in the fire frequency and severity patterns for project area forest stands? How do these patterns vary dependent upon elevation, moisture patterns and hydrology, and forest stand Plant Association Groups across project area forests? What are the cumulative changes to natural forest conditions, forest soil communities, moisture availability, and hydrological functioning that have occurred over the past century plus, and what are the past and ongoing causes of these changes?
- Utilizing a centuries-long assessment of the area's natural range of variability and climatic fluctuations; are current forest conditions, including 'fuels' levels and fire patterns, within natural variable fluctuations for the area forest's Plant Association Groups? For example, mixed conifer mid and upper elevation forests tend to burn less frequently, with natural accumulations of dead woody materials and increasing stand density and complexity over time between longer periods of recurrent mixed fire severity cycles. Some lower elevation and south-facing ponderosa pine dominated PAGs generally have more frequent recurrent fires and less build up of woody debris and understory vegetation. It is important that project planning be tailored to fit, rather than unwisely tamper with, natural ecological processes and functioning.
- There is no need to include commercial logging as proposed to achieve the project's purported ecological objectives. Indeed science research documents significant harms from commercial logging that are antithetical to the project's stated purpose and need; and largely recommends against any commercial logging removal of trees and forest structure in mixed conifer, mixed fire severity forest stands. For drier more frequent fire ponderosa pine forest stands there exists a varying range of scientifically controversial research and recommendations pertaining to limited levels of thinning small diameter trees in areas where three or more fire cycles have been missed and young tree and brush density levels are unnaturally high. Such research however, recommends strongly against the removal of trees that exhibit inherent fire resistant characteristics, as once removed these are soon replaced with more fire-prone trees and brush.
- To the extent that the stated ecological goals can be met, in addition to providing for the wildlife viability requirements of the NFMA and to protecting natural resource concerns including ecological functioning, forest soil communities, aquatic species, and water quality can also be met; it may be that there could be a limited component of small diameter wood resources resulting from the proposed project. However, economic objectives must be defined by scientifically supported

ecological needs, and precluded at the onset from unduly influencing or directing project design and development.

- All thinning slash must be removed from the area within one year, as by the second year's summer season it would contribute significantly to greatly increased unnatural risk of severe fires in the project area, which would be antithetical to the purported project goals.
- Road density is already high in much of the project area. The agency already has far too many roads that it is incapable of maintaining, and which harm wildlife, aquatic systems, and forest ecological integrity throughout the area. There should not only be absolutely no new roads of any kind, including so-called "temporary roads" anywhere in the project area. The project must instead remove excess and resource damaging roads and restore roadbeds to natural forest topography and vegetation, and bring density levels into compliance with the LRMP standards and wildlife thresholds.
- Roadless areas, including uninventoried ecological unroaded areas, must be disclosed and protected from project actions, so that natural processes continue untampered with in these ecologically significant areas.
- Old growth and mature forest stands, connective habitat, RHCAs, and areas of ecological and recreational significance must be protected from management disturbance actions.
- The EIS must develop viable plans to protect, maintain, and recover listed species, species of concern, and indicator species populations, habitat, distribution and abundance throughout the project area.

### **Violations of objective scientifically based NEPA analysis and meaningful public involvement**

As proposed, we have serious ecological and legal objection to the Galena Project, which largely fails in its initial assumptions to be based upon credible science, and the natural variability of the area's ecological processes, functioning, and resilience. NEPA requires project analysis be objective, and fully disclose area conditions, pertinent science, and ecological and listed-species maintenance and recovery needs. NEPA prohibits analysis processes being misused for preconceived projects with forgone conclusions already in place.

This is just the scoping period for the Galena Project area, and as such the notice should not be already proposing mapped out logging units and planned actions. Indeed, given that the agency has provided absolutely no information on species of concern, salmonid watersystems, and cumulative impacts in the project area, and conducted no publicly disclosed analysis addressing these and other essential environmental issues, it is alarming that logging units are already in place on a map for this proposed timber sale disguised as a WUI and ecological restoration project.

Instead, this phase of the public NEPA process mandates meaningful scientifically sound, environmentally accurate objective analysis and informed meaningful public involvement. However, at the onset in the scoping notice, based purportedly upon the above presumptive and largely scientifically insupportable or deficient "purpose and needs," the District discloses the pre-analysis-preconceived Galena project already involves:

- Commercial logging and burning of 6,900 acres of forest;
- "Pre-commercial" thinning of 2,800 acres;
- "Prescribed" - or more correctly stated – controlled fires on 24,100 acres;
- Proposed logging methods ground based include soil devastating tractor machinery and unspecified skyline systems, with a note that later helicopter logging may occur in a later area project depending on uncertain future economics;
- Unspecified miles of new road construction, including so-called "temporary" roads;
- The notice does not disclose the potential extent of closed roads that may also be opened?;

- Unspecified miles of road reconstruction and/or maintenance (if “reconstructed” roads are currently non-navigable and have been reclaimed by nature these must be categorized as new road construction as analysis data becomes available);
- Unspecified extent of logging hauling miles, stream crossings, and direct and associated impacts;
- Disclosure of two possible Forest Plan amendments associated with the proposed project;
- No disclosure of ESA, regional, and state listed species and species of concern that may be within the project area, and no information on species population status and trends, or on potential project impacts, objectives, or concerns related to species recovery objectives and habitat protection;
- No watershed analysis disclosures or information other than what can be discerned from the accompanying maps;
- No disclosures of water system quality listings (Oregon State 303(d) list) or listed aquatic species and species of concern that may be within the project area;
- No disclosures of cumulative impacts or simultaneous project implementation and management analysis that is or may occur within the proposed project area (the Balance project is in the greater vicinity, and the Crawford project is located upstream in the same watershed in-part; the Dads Creek Project is located across the watershed divide some miles distant; and livestock grazing allotments are active in the area, as are mining claims; OHV use and impacts in the project watersheds and greater district are undisclosed;

It is clear from reviewing the proposed project actions, and the actual impacts of the similarly premised logging projects in the Malheur and elsewhere in the region, that implementation of the proposed logging activities would irreparably degrade forest ecology, wildlife habitat, and impair water quality in the area’s watersheds, and be inconsistent with credible science and the purported ecological and fire risk reduction objectives of the project. Proposed logging in old growth forest areas, conversion of forest stand structure, logging in goshawk territories including nesting and PFA areas, new and so-called “temporary” new road building; thinning of mature sized and mature and old characteristic trees; impacts to listed species, indicator species, and species of concern including (but not limited to) goshawks, flammulated owls, neotropical migrant and native interior forest bird species, lynx, wolverine, marten, elk, deer, wolves, bear, cougar, small mammals, bats, and other wildlife species; impacts from ground-based heavy logging machinery; ground and airborne sedimentation into area salmonid watersheds; and cumulative impacts from this and other area projects would undeniably result in further significant degradation of the ecological integrity, wildlife habitat, soil hydrology, and aquatic systems in and around the project area.

As per a number of agency projects across the region where we have negotiated ecological, legal, and/or appeal issues; including the Malheur’s Canyon, Dads Creek, Balance, Crawford, Egley, and Thorn projects; the Ochoco’s Willow Pine, East Maury, and Spears projects; the Deschutes’ Snow Fuels, BLT, South Bend, Lava Cast, Sunriver, Sisters Area Fuels Reduction, and other projects; and the Umatilla’s Rimrock, Sunflower Bacon, Penland Lakes, Falls Meadowbrook, and other projects; it is possible there are ecologically and economically feasible common ground provisions that could be incorporated into the proposed project objectives, and the development of scientifically sound action alternatives. However, this would require the agency adhere to the letter and intent of NEPA environmental policy law in conducting a legal, scientific, and environmentally comprehensive objective EIS analysis process for this project. We look forward to discussing conservation concerns with this proposed project soon, before any more time and resources are spent on developing the above proposed pre-conceived, scientifically-

contrived, and legally insupportable Galena logging project.

### ***Scientific Recommendations and Ecological Accuracy***

The scoping notice's proposed actions appear at best to be based upon scientifically controversial assumptions, goals, and management methods. Whether the agency's proposed actions will effectively 1. *"Improve forest health and move towards fire-adapted ecosystems,* 2. *Reduce the fire hazard (including surface fuels, ladder fuels, and crown fuels) within the urban interface on National Forest lands, and* 3. *Create stand conditions that reduce the chances of a ground fire becoming a crown fire, and a small fire becoming an uncharacteristic wildfire."* are likely to depend upon the degree in which these actions embody scientifically supportable ecologically appropriate methods to effectively address naturally occurring forest fuels, fire risks, and naturally inherent insect mortality in forest ecosystems.

As this project begins its NEPA analysis, it is important the agency assess and disclose the full range of applicable scientific research. Proposed management actions must be supported with analysis disclosures of substantiating science **and** disclosures of scientific controversy or nonsupport. Accurate site-specific conditions, cumulative impacts analysis, and disclosures and assessments of the proposed projects impacts upon species of concern must be presented in the EIS. The project must base its planned actions on credible scientific recommendations towards protecting, restoring and maintaining the long-term ecological integrity and functioning of the area's forest ecosystems, ensuring the project meets the biodiversity, habitat, and viability requirements of native species of concern.

Common conservation ground can best be achieved when proposed actions are based upon credible ecologically non-controversial science research restoration recommendations; avoiding actions that could result in significant harms to natural forest ecology and biodiversity. Proposed actions should not exceed those scientifically necessary and capable of achieving legitimate ecological purpose and need goals. Removal of mature, old, and inherently fire resistant trees; unnatural logging removal or excessive manipulation of established forest structure; excessive thinning in ponderosa pine stands; logging-thinning in mixed conifer mixed-fire severity forest; use of forest soil community and vegetation damaging heavy logging machinery; new, "temporary," and other road construction would adversely impact forest ecology, biodiversity, vegetation, soils, wildlife, avian, botanical & other species of concern populations and habitat; resulting in further degradation of the ecological integrity, wildlife habitat, soil hydrology, and natural systems in and around the project area.

Similar with other projects in the region, project provisions need to include:

- A. Providing for the retention of all trees with old and mature characteristics regardless of size, projected longevity, or condition;
- B. Interior forest stands, mixed conifer forests, and mixed fire severity areas, should be ecologically maintained without destructive commercial logging – allowing for ongoing natural cyclic processes, conditions, and functioning. Management actions should be designed to maintain and augment, rather than hinder, natural processes, and to provide for the viability and habitat needs of dependent forest species;
- C. Protecting soils and native plants by limiting machinery use and requiring low impact light machinery and practices in all areas where machinery is employed;
- D. Protecting RHCAs, seasonal tributaries and drainages, and localized moist 'riparian' areas where these may seasonally occur, by prohibiting machinery use and logging in these locations;
- E. Seasonal restrictions on project implementation protecting avian species during nesting and fledging periods;
- F. No new roads of any kind may be built. Road reconstruction may not occur on naturally reclaimed non-navigable (passenger car) roads. Road density levels must be reduced throughout the project area, both in localized units and overall. Density levels in unit areas may not be artificially diluted by averaging these with the inclusion of unroaded or entire project analysis area acres;

- G. No logging-thinning actions or machinery use may occur in unroaded or ecologically significant areas;
- H. Livestock grazing must be suspended for one year pre-project implementation and between 5 to 10 years post project from all affected action areas;
- I. Other provisions as ecologically appropriate.

The notice proposes a series of varied scientifically insupportable logging-‘thinning’ actions, rationalized by natural forest ecological components of fire/fuels, insects, and disease, and by the timber-dominated scientifically insupportable Grant County “Community Wildfire Protection Plan’s” (CWPP) inflated Wildland Urban Interface (WUI) extent (which strays far beyond legitimate WUI areas in extent, actual fire risk, and WUI population density requisites. The proposed project actions have generally proven to be far more harm than benefit, varying in degree of harms dependent upon the extent, level, and methods of thinning employed and the location and timing of thinning actions.

Management actions work best when they are kept within the parameters of greater scientific consensus rather than controversy. Care must be taken limiting thinning to scientifically supported actions and locations. Project actions must ensure sufficient trees and forest stand structure remain to provide for the diverse optimum habitat needs of dependent wildlife species, and to provide for both localized and landscape scale forest ecological integrity. Management actions that excessively thin forests can be antithetical to project goals of reduced risk of severe fires and enhancing forest ecological resiliency. Excessive logging-thinning actions increase and exacerbate the risk of severe fires, as fire resistant mature and old trees are soon replaced with fire-prone brush and small diameter trees. Soils disturbed and impaired by heavy logging machinery cannot support the healthy subsurface soil microbial communities and hydrological functioning necessary to maintain healthy trees and forests. Reduced soil moisture retention in logging damaged forest soils increases the risk and extent of severe fires during recurrent summer dry-seasons. Existing populations of invasive plants can be further spread, and new introductions of exotic invasive plants may occur as a result of soil disturbing logging-thinning actions.

Limiting thinning to only smaller diameter trees and/or employing variable diameter thinning limits as appropriate to PAG site-specific conditions have more scientific and ecological support. For example, limiting felling to trees <12” dbh, or a range of variable diameter limits specific to frequent fire PAGs from 10” to 14” dbh (16” dbh at most), is less scientifically controversial and more ecologically capable of achieving project purpose and need goals.

We look forward to reviewing the draft EIS for this proposed project. The EIS must disclose and analyze:

- Old growth forest areas size and location;
- Listed species, focal species, indicator species, and species of concern in, transiting, and adjacent to the project area;
- Landscape scale and localized wildlife connectivity, including migration, foraging, and dispersal habitat and routes;
- Soil conditions, and soil microbial community qualities and impacts;
- Existing invasive plant population and location concerns, and invasive exotic plant introduction and spread issues;
- Ecosystem and soil hydrological patterns, seasonal moist riparian areas and flows, salmonid and other watersystems, 303(d) listed areas, and any affected aquatic species;
- Excessive road density issues, including plans to remove excess roads and bring the area into compliance with Forest Plan road density standards and wildlife thresholds. No new or temporary roads should be proposed;

- Inventoried and uninventoried roadless areas, and/or areas of significant ecological resource value or concern in or nearby the project area, including connective habitat within or along the project;
- OHV use and issues in and adjacent to the project area;
- The full range of applicable scientific research pertinent to the proposed project, including that which may substantiate proposed actions and that which recommends against such actions or addresses issues of scientific controversy;
- Natural fire cycles, patterns, and conditions that historically occurred in this area, fire occurrence in the area during the past 150 or more years, and recent current fire and management history;
- Cumulative impacts for past, present, and future projects in and adjacent to the proposed project area, including livestock grazing, OHVs, other thinning-logging actions, burning, recreational projects, and all other known or foreseeable actions;
- Other pertinent information as environmentally, scientifically, and legally appropriate.

The EIS must develop a full range of truly different scientifically and ecologically substantiated action alternatives. To help identify additional conservation concerns, we herein reference the substantial ecological, science, and legal concerns and issues noted in our comments (and/or appeals and litigation as applicable) on the Malheur NF's similarly premised "fuels reduction/forest health" logging-thinning projects.

We recommend the agency fully notify residents and property owners throughout the greater project area, and hold a public open house and a field trip to the proposed Galena Project area, as well as a public review of the impacts and efficacy of similar logging-thinning projects in the Malheur that have been or are being completed. We look forward to discussing these and related conservation concerns with agency decision-makers and planning staff soon.

For our natural 'wild' forests,



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*Quotations, however, eloquent or inspiring, cannot compare to a day spent free amidst the wonders of wild nature...*