

*Oregon Chapter Sierra Club
Asante Riverwind
Eastern Oregon Forest Organizer
P.O. Box 5534
Bend, Oregon 97708
(541) 322-4065
asante.riverwind@sierraclub.org*

May 28, 2008

Comments on the Ochoco NF proposed Lookout Mountain Prescribed Fire Project

William Queen, District Ranger,
Dave Owens,
Jeff Bell,
Lookout Mountain Ranger District,
Ochoco National Forest,
3160 NE Third Street,
Prineville, OR 97754
comments-pacificnorthwest-ochoco@fs.fed.us

Our organizations have reviewed the scoping notice dated April 27, 2009 and accompanying map for the proposed Lookout Mountain Prescribed Fire Project. The following are the joint 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 20,000 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 greater recreationally popular Lookout Mountain 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 Lookout Mountain area are of significant concern to both of our organizations.

The proposed project area encompasses 22,700 acres, including the ecologically significant Lookout Mountain Management Area, a designated roadless area. Elevation ranges from 4,000 feet to 6,800 feet, with forest slopes and ridges facing all aspects of the compass, with a corresponding mosaic diversity of plant association groups and varied cyclic ecological patterns, including a range of mixed fire severity cycles within the area's mixed conifer forests. Management actions in this ecologically significant area, especially within the designated roadless and unroaded areas, must minimize disturbance levels. Actions should be consistent with scientific research recommendations for such areas, and in accord with natural ecological patterns appropriate for the varied site-specific plant association groups, and their mixed fire severity fluctuations. Strategically limiting management disturbance actions, utilizing strategically placed land area treatments (SPLATS or SPOTS) rather than landscape scale levels

of disturbance will better protect roadless and interior forest habitat from unwarranted intrusive harm adversely affecting dependent species.

Species of potential concern noted in the scoping letter include pileated woodpeckers, elk, and goshawk. Additional species of concern not as yet noted include native and neotropical migrant birds; owls including pygmy, flammulated, screech, great horned, and great gray owls; other woodpecker species including white-headed, black-backed, Lewis', and Williamson's among others; bats species; other raptors including sharp-shinned and Coopers hawks; other terrestrial species that may at times be transiting or foraging in the greater project area including wolverine, lynx, bear, cougar, and potential dispersing wolves which have been returning to the Blue Mountains region farther to the east, among others. [Roadless areas play particularly important roles as dispersal refugia for a number of far-ranging species, in addition to potential home-territory habitat depending upon roadless extent and levels of disturbance.] Endemic and/or regionally rare and sensitive plant species may also exist within the project area. Foraging sources and prey species for species of concern also exist within the area, ranging from invertebrate species and plants to terrestrial mammals including squirrels, rabbits, deer, and others. The assessment for this project must address and minimize potential adverse cumulative impacts to these species from proposed management disturbance actions associated with this project, especially concerning management disturbance within the ecologically significant habitat located in the greater roadless wildlands area.

Appropriate strategic location limitations and seasonal restrictions on management disturbance actions during ecologically vulnerable periods are important to ensure the project protects and enhances overall ecological resilience including abundant viable native species biodiversity. Vulnerable periods include: spring nesting and denning periods; during spring's plant, soil community, and invertebrate species emergence from winter's retreat; the critically important late fall period when numerous species are foraging and preparing for winter survival; and during native plant species seed development and dispersal periods.

Generally fires naturally occurred during the hot dry summer periods, with limited fires in mid to late spring, and again through early to mid fall. Fires outside of these periods tended to be rare, and significantly smaller in scale. While restoring fire to its natural patterns and roles within the greater landscape is a long-term ecological necessity; given the high levels of cumulative management impacts in the greater area forests, this must be done with appropriate consideration for a number of natural resource concerns and objectives. Among these are maintaining viable populations of species of concern; maintaining habitat viability, extent, and connectivity; and retaining large interior forest roadless areas where management disturbance is largely absent. While it may not be feasible to conduct fires during high-risk fire summer season, care must be taken to limit fire extent and impact when these are outside of naturally occurring fire periods.

Planning must also address the range of potential impacts resulting from planned burning, including the natural soil community, hydrologic, and vegetative recovery within and adjacent to burned areas. In general recovering post fire landscapes have significantly different management needs than unburned green forest ecosystems. Management activities must be based upon sound fire recovery 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 burned areas. While controlled burns are generally intended to be light impact, there have been a number of occasions when such burns have resulted in higher levels of fire severity impacts that were intended. Providing for adequate soil and native vegetation recovery time before allowing resource damaging livestock grazing to resume is essential to the long-term ecological resilience and restoration objectives of this project. Scientific research

recommendations call for grazing rest periods of between 5 to 10 years for moderate to severely burned areas.

Forest connectivity including hiding cover continuity is important within the project area, especially given its recreational popularity, and the inclusion of roadless and adjoining unroaded areas, in addition to the cumulative impacts ongoing and past management. The nearby proposed Canyon Project and other area management projects are of particular cumulative impacts concern, especially regarding the level, duration, and extent of management disturbances in the greater forest area.

Large diameter downed trees in the planned burn areas, especially where squirrel middens and other utilized habitat exist, should be buffered as possible to prevent undue harms and loss of important habitat. In addition to habitat areas, large 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. Fallen large diameter logs are 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 forest edge environments and near roadways. Large downed logs also play important roles in stabilizing forest soils, which are subject to continual erosion from rainfall, snowmelt, and runoff. Steep forest 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 vegetation takes root, spreading over time to less stable soils. These natural resources must be protected across the greater project area landscape.

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. It is important that riparian resources including seasonal runoff areas be protected as possible throughout this project.

It is important to identify where existing invasive exotic plants are located, or where high potential exists for new introduction of invasive exotic plants, and ensure project actions do not further spread or maintain invasive non-native plants.

OHV use, access, regulatory enforcement, and impacts within the project area are also of concern, especially in relation to potential cumulative disturbance in the greater project area.

It is important that a project of this significant scale, duration, and location reasonably address and incorporate the above environmental analysis issues and concerns. If other management actions are planned in the same greater forest area, cumulative impacts – especially

from overall management disturbance – must be assessed and addressed with an aim to minimize the extent and impacts of such disturbance upon wildlife species of concern habitat and other natural resource values. Overall the 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.

It is important that effective controlled fire provisions are employed to ensure the area's remaining old growth trees don't succumb to fire due to excessive duff and fuels buildup near their base. With appropriate provisions, including strategic and PAG limitations, returning fires to the area's fire ecology forest ecosystems can be part of a range of necessary ecological steps in the proactive long-term restoration and protection of the Ochoco's forests.

Our organizations are concerned for the long-term ecological resilience and restoration of the Ochoco's forests. We look forward to reviewing the agency's environmental analysis regarding this proposed project as noted above.

For the Natural Heritage of Us All,

A handwritten signature in black ink that reads "Asante Riverwind". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Asante Riverwind
Eastern Oregon Forest Organizer
Oregon Chapter Sierra Club
P.O. Box 5534
Bend, Oregon 97708
(541) 322-4065 office
(541) 306-7737 field
asante.riverwind@sierraclub.org

and for: Karen Coulter, Director,
League Of Wilderness Defenders-Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, Oregon 97830
(541) 468-2028 office
(541) 385-9167 voice mail