



**Federal Forestland Advisory Committee
Salem, Oregon
September 7, 2007
Comments Submitted by Tom Partin
President, American Forest Resource Council**

I want to thank the Federal Forestland Advisory Committee for taking my comments today on the very important issue of water quality and related management challenges on federal forestlands.

While there are many factors that influence the quality and quantity of water that originates on our federal forest lands, I believe that catastrophic wildfire presents the greatest risk to water quality, and to the wildlife species that depend on clean water for their existence. Wildfire is often the last link in a chain of events that culminates in the total destruction of entire watersheds and all of the plants and animals that depend on it for their survival.

In my opinion, nobody really wants to harm a watershed and most of us want to see them improved and to remain healthy. The discussion then becomes what and how is the best way to accomplish this. One school of thought is to take a hands off approach and allow watersheds to remain in a so-called natural state. Another school of thought and I believe the prudent one is to do periodic management within forested watersheds to keep them healthy from insect and disease attacks and to make sure they aren't destroyed by catastrophic wildfire.

Today I want use the example of the Shaketable Fire which occurred in 2006 on the Malheur National Forest to point out where well intended efforts to protect some terrific habitat for Rocky Mountain elk, Mule Deer, Salmon and Steelhead went terribly wrong.

The story begins in 1991 when the Bear Valley Ranger District wanted to treat an area that was heavily infested by insects and disease and also had heavy fuel loading present due to dense vegetation and a high amount of timber mortality. The area was in the Aldrich Mountain range located West of John Day, Oregon and was home for large population of Rocky Mountain Elk and Mule Deer and whose waters provide habitat for the native runs of steelhead and spring Chinook that travel up the John Day River to spawn.

Two projects were identified for treating these stands, the Aldrich and Todd timber sales. These projects were met with opposition from two groups. Not surprising one group was the Blue Mountain Biodiversity Group headed up by Karen Coulter and Asanti Riverwind. Their role then and still today is to roadblock meaningful forest health projects on east side national forests primarily the Malheur, Ochoco, and Deschutes National Forest. The second group that wanted to limit or prevent any treatments on the area was the Oregon Department of Fish and Wildlife.

In a 1991 letter (which is included) ODF&W personnel list the following points as to why they did not support the project:

- Maintenance of present undisturbed wildlife cover and escape habitat is needed
- Loss of security area for elk and deer could occur.
- Soil damage causing heavy sediment release in steep slope headwater streams could be a result.
- Water Quality for fish could be severely impacted.

In fact the final comment stated "at this time we do not see any fish and wildlife opportunities and our management preference would be to leave the area in an unlogged, unroaded status."

In the following year after some modifications had been made to the project and a reduction in the amount of acres to be treated in the area had been made, the Forest Service again tried to revive the project and package it in a project called the Todd Timber Sale. Once again ODF&W personnel reviewed the area and again their response was "to be perfectly honest, we prefer a "No-Action" alternative in this area for watershed, aesthetic, and recreational reasons."

In 1996 the Todd project was again revisited in an attempt to treat an ever-growing fuel loading and Spruce Budworm epidemic creating a huge fire risk. Again Blue Mountain Diversity and ODF&W did not want the project to move forward and in the local newspaper the *Blue Mountain Eagle*, an ODF&W representative was quoted as saying "Because this area provides security for one of the premier elk units in the state, I have no doubt this timber sale will affect our ability to manage for elk."

Well in 2006 this entire great elk, deer and fish habitat burned up in the Shaketable fire which consumed 14,500 acres. This was not a fire with mosaic burn patterns; it was a total devastation of plant and animal life. One can now stand on the summit of the Aldrich Mountain Range and look unobstructed down slope for 5 miles to highway 26. Gone is the hiding cover, gone are the riparian buffers, gone is the clean cool water for fish, and gone are all of the amenities these groups were trying to save.

Therefore I urge this panel to take the prudent school of thought on how to protect our riparian and other special areas. Let's treat them to reduce the fuel loading and make them healthy for decades to come. There are too many other examples similar to what happened on Shaketable and we cannot allow them to continue in the future.

I will leave you today with some other visuals taken following the Summit Fire, also on the Malheur National Forest which burned in 1996. A thunderstorm event which occurred in the spring following the fire caused devastating erosion and stream damage. This is another impact to riparian areas for not doing preventative forest management projects.

Thank you for taking my testimony today, and I would be happy to answer any questions.





THORN FIRE SALVAGE RECOVERY PROJECT
Blue Mountain Ranger District
Malheur National Forest
Grant County, Oregon

Background:

Starting August 22, 2006, the Shake Table Fire Complex, located 20 miles south west of John Day, Oregon, burned approximately 14,527 acres across mixed land ownership. Of those acres, approximately 13,536 acres were on National Forest System Lands administered by the Blue Mountain Ranger District, Malheur National Forest. Gary L. "Stan" Benes, Forest Supervisor of the Malheur National Forest, as responsible official, has decided to prepare an environmental impact statement (EIS) to disclose environmental effects on a proposed action to recover the economic value of dead and dying trees damaged in the Shake Table Fire Complex, and remove potential hazard trees from open forest travel routes within the Todd, Duncan, Fields Creek and Dry Creek subwatersheds. The proposed action will be referred to as the **Thorn Fire Salvage Recovery Project**.

Purpose and Need for Action

The purpose and need of the Thorn Fire Salvage Recovery Project includes: (1) Recovery of the economic value of the dead and dying trees consistent with protection of other resource values; and (2) Improving public safety within the fire area by removing potential hazard trees for public safety along open forest travel routes.

Proposed Action

This action includes salvage of dead and dying trees from approximately 7,952 acres and removal of potential hazard trees for public safety along open forest travel routes. Salvage harvest methods would include ground-based and helicopter logging systems. Approximately 80 percent of the harvest area would be salvaged by helicopter. No commercial harvest or road construction is proposed within Appendix C Inventoried Dry Cabin, Cedar Grove and Shake Table Roadless Areas. Road activities associated with salvage and restoration will be limited to reconstruction, opening and re-closing existing roads, and maintenance. No new roads would be built. Following site preparation, approximately 7,952 acres would be planted with conifer seedlings. Forest Plan amendments related to old growth replacement, snag levels, visuals, timber harvest within Semi-Primitive Non-Motorized Recreation Areas, etc. would be included as needed. The proposed project area would be that area on Forest Service System Lands, within the fire boundary (the fire boundary is depicted as a red line) outside Appendix C Inventoried Roadless Areas. See attached map for project area.



November 5, 1991

Douglas V. Robin
District Ranger
Bear Valley Ranger District
528 E. Main Street
John Day, OR 97845

WIDOWS CREEK/DRY/FLAT/ALDRICH CREEK EA

Thank you for requesting our assistance in identifying issues and concerns for this planning area.

As you are aware, these north slope drainages provide for excellent wildlife escape habitat and produce high quality water for fish, in several important tributaries and the John Day River. We list the following issues and concerns related to insect and disease timber salvage for this planning area:

- 1. Maintenance of present undisturbed wildlife cover and escape habitat.
- 2. Loss of the needed security area for elk and deer.
- 3. Soil damage causing heavy sediment releases in steep slope headwater streams, in areas such as Widows Creek and Flat Creek.
- 4. We are concerned about wildlife impacts that might occur in relation to our WMA, which lies adjacent to the forest:boundary.
- 5. The potential for slumps and land slides into drainages caused by activity on extremely steep slopes is a major concern.
- 6. We are particularly concerned with potential damage to springs and the upper reaches of Flat Creek, which feed ODFW Aldrich Ponds. These ponds



Douglas V. Robin
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are managed for high quality trout fishing, which degraded water quality could severely impact.

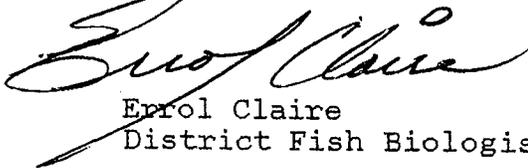
7. This area provides a significant seasonal habitat for the rufus hummingbird, which frequents several steep north slope springs in the area. Primarily feeding on unique flowers found in the deep shade of these slopes.
8. The riparian and spring areas are excellent ruffed grouse habitat and the virgin white fir stands provide excellent blue grouse habitat.
9. The area serves as a critical midsummer habitat for mule deer wintering on ODFW - WMA lands and supports a large elk herd in summer and fall months.
10. We're concerned about timber activities that could allow increased domestic livestock grazing, which would degrade critical riparian habitats in the area.
11. One of the larger populations of pileated woodpeckers inhabit this area. We would not like to see this population diminished.

At this time, we do not see any fish and wildlife opportunities. Our management preference would be to leave the area in an unlogged, unroaded status.

Please keep us informed as you develop your alternatives for this area.

If you have questions, give us a call.

Sincerely,


Enrol Claire
District Fish Biologist


Greg Mattan
District Wildlife Biologist

c. Williams
Ely

Oregon

August 19, 1992



DEPARTMENT OF
FISH AND
WILDLIFE

John Day District Office

Mr. Jan Fauntleroy
Bear Valley Ranger District
528 E. Main Street
John Day, OR 97845

Dear Jan:

Thank you for the Field Review of Aldrich Timber Sale area on July 20. It is definitely more valuable to discuss these projects on the ground than it is to rely on tables, graphs, and verbal descriptions on paper.

To be perfectly honest, we prefer a "No-Action" alternative in this area for watershed, aesthetic, and recreational reasons. The landslide potential has severe implications from a watershed perspective. If the "No-Action" alternative is rejected, we favor the alternatives that minimize road building, reduce opening size, transport harvested trees via helicopter, and don't harvest healthy trees. If this sale is being done for forest health reasons, we feel that healthy pine, larch, and any other tree species should be left to help regenerate stands and stabilize slopes. Proposed buffers along the steepest drainages may not be enough, even with Forest Plan Standards and Guidelines. We fear that landslides will not be filtered out by a 100 ft. buffer on slopes in excess of 60%.

We also fear alteration of the quality experience available at Aldrich Ponds. Timber harvest/salvage above the ponds may affect water quality, visuals, water quantity, and fish production. We would like to remain involved in the planning process for Aldrich Timber Sale, and will be especially interested in seeing the B.E.'s and analysis of consequences developed for each alternative.

Thanks for keeping us in the planning process.

Sincerely,

A handwritten signature in cursive script that reads "Mike Gray".

Mike Gray
Assistant District Fish Biologist



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Williams

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Roads of controversy

A plan to cut bug-damaged timber collides with the desire to preserve wilderness habitat

By BRIAN T. BEEHAN
of The Oregonian staff

JOHN DAY — The timbered slopes of Aldrich Mountain are far from Capitol Hill, but here amid the steep draws of Eastern Oregon, the political harangue over Congress' salvage logging rider thuds onto the ground.

With a wallop, At question is whether we should be building roads into roadless areas to extract dead and dying timber.

The salvage logging measure — which suspended most environmental protection laws to spur logging in bug-damaged forests — seemed tailor-made for the Blue Mountains. A decade of drought and insect attack has left some pine and fir stands in tatters.

Industry officials say the uproar over westside salvage sales — which actually include mostly green, healthy timber — deflects attention from the heart of the legislation. They say salvage logging will help restore Oregon's damaged eastside forests.

But execution of the salvage rider promises to be thorny in the 1.46 million-acre Malheur National Forest and on Aldrich Mountain.

At stake are the last alpine forests unscarred by roads, water quality for wild salmon and steelhead, and shelter for prized herds of trophy Rocky Mountain elk. Also at stake is the economy of rural Grant County, where timber is the top industry, and local mills are desperate for saw logs.

"We've had 10 years of non-management and a huge fire potential at the same time we have mills starving for logs," says Ted Ferrioli of Malheur Timber Operators, a group representing the wood industry. "It's the world's top no-brainer. If the trend continues, we are going to be in a serious problem, and there will be mill closures."

The U.S. Forest Service has rattled environmentalists by proposing seven salvage sales in roadless areas in the Malheur forest. One proposal, the Todd timber sale, would



The snowy slopes of the Dry Cabin roadless area on the south side of Aldrich Mountain are proposed for salvage logging under a measure passed by Congress in July. State biologists worry about the potential effect on Rocky Mountain elk and wild steelhead.



Because this area provides security for one of the premier elk units in the state, I have no doubt this timber sale will affect our ability to manage for elk.

Craig Foster, wildlife biologist, Department of Fish and Wildlife

build roads as a first step in cutting timber on thousands of virgin acres. The agency says trees killed by insects must be thinned to reduce the risk of catastrophic fire.

"The problem we have now is we've precluded fire for over 100 years," says Doug Roblin, ranger for the Bear Valley District. "We're trying to mitigate a horrendous build-up of fuels. It's a pretty scary picture."

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horrendous build-up of fuels. It's a pretty scary picture.

Doug Roblin, ranger, Bear Valley District