BEFORE THE REGIONAL FORESTER,

REGION SIX OF THE UNITED STATES FOREST SERVICE

In Re: Objection to The Dalles Watershed Phase II Hazardous Fuels Reduction Preliminary Assessment on the Mt. Hood National Forest

OBJECTORS:

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DATED this 29th day of September, 2011

Introduction

NOTICE IS HEREBY GIVEN to the Regional Forester, Region Six of the United States Forest Service, that pursuant to 36 CFR § 218.7 Pursuant to 36 CFR 218, Bark is filing this objection concerning the Mt. Hood National Forest's The Dalles II Hazardous Fuels Reduction Project Preliminary Assessment ("PA"). Bark has demonstrated our specific interest in this HFRA project by our participation in The Dalles Phase I collaborative group, by commenting on the scoping comment, and by our past and continued involvement in the management of the Mt. Hood National Forest (MHNF). Bark's continued interest and involvement in this project creates standing to object to this decision according to 36 C.F.R. § 215.11(a)(2).

Implementation of the The Dalles II Hazardous Fuels Reduction Project (hereinafter "Dalles II" or "Project") would adversely affect Bark's interests because the proposed logging activities will degrade the ecological integrity and wildlife habitat in and around the analysis area, without clearly meeting the express purpose and need of the project: to protect water quality.

Bark participated in the South Fork Mill Creek Collaborative Group from 2004 to 2006 during which the group, comprised of the City of The Dalles watershed manager, timber industry representatives, ODF&W wildlife specialists, Forest Service timber planners, conservation organizations, and nearby residents, thoroughly considered municipal water needs and available science. While Bark did not agree with all of the Collaborative Group's consensus-minus-one

recommendations, the recommendations were nonetheless the result of an engaged and well-reasoned process. For this reason, Bark does not understand why many of these recommendations seem to be disregarded in the design of Dalles II, including giving priority to thinning small diameter trees in plantations, only treating areas in Fire Class Conditions 2 & 3, and creating a long term Fire Management Plan.

Drawing from our experience in the Collaborative Group, and upon review of the best available fire science, Bark believes that the Forest Service should focus on treatments that are: 1) most effective at creating fire resiliency, and 2) do not themselves increase risk to water quality. In contrast, the vigorous overstory removal of Dalles II focuses on removing the least flammable component of the forest (trunks), resulting in an increase the volume of litter on the forest floor, and drier conditions with faster wind speeds that can significantly increase a fire's rate of spread, flame length, and create more erratic shifts in fire speed and intensity. In addition, the logging requires heavy machinery, roads, landings, and skid trails that have known negative impacts to hydrology. This is contrary to the goal of protecting water quality.

In our scoping comments, Bark advocated for a science-based fire restoration alternative that focuses on the non-commercial removal of small diameter trees. The Forest Service's response to this comment did not make sense to us. The PA stated: "[u]sing management strategies such as thinning overstory and understory trees would not reduce the risk of large stand replacing wildfire events because the overstocked and dense stands would remain and the hazardous fuels associated with the standing trees (fuel ladders) would not be removed. Also, these methods would not reduce hazardous fuel loadings and fuel ladders (small reproduction that increases potential for crown fire initiation) to reduce the risk of unwanted effects of wildfire . . .." PA at 2-1. While the Forest Service's reasoning is unclear at best, let me clarify Bark's position:

Bark is suggesting that the Forest Service create an action proposal based on peer-reviewed fire science, which almost uniformly states that removal of large trees from the forest does not help, and may harm, increased fire resiliency. A "non-commercial" science based alternative would enact the very prescriptions – understory thinning, removal of ladder fuels, and reduction in fine surface fuels – that the Forest Service says are necessary to meet the purpose and need. Bark's proposed alternative would in no way limit these actions, it would simply remove the commercial incentive to log the most economically valuable trees, which are often the trees with the most ecological value for both fire resiliency and wildlife habitat.

In this context, Bark's primary objections to the project are that by including extensive overstory removal, the Project will: 1) not meet the purpose and need; 2) unnecessarily degrade habitat for spotted owls and other sensitive species.

We continue to advocate for an alternative that increases fire resiliency without compromising the health of forest ecosystems and all the creatures dependent thereon.

Bark files this objection because, as this is an HFRA project, we have no remaining recourse to comment and influence the final decision. The recently released PA is our first opportunity to review the proposed final version of this project in full detail. If the Forest Service modifies the project to include reasonable, scientifically based, ecologically protective changes based on these recommendations and those of the South Fork Mill Creek Collaborative Group, Bark believes that the project could move forward in a way that better accomplishes the stated purpose and need.

Suggested Resolution: Bark respectfully requests that the Forest Service either withdraw The Dalles II Hazardous Fuels Reduction Project PA and prepare a new NEPA analysis with a range of scientifically based alternatives and follow the notice-comment-appeal regulation at 36 CFR 215 - or modify the proposal as follows:

1) Implement the consensed recommendations of the South Fork Mill Creek collaborative group (attached);
2) Focus action on removal of ladder fuels, and small diameter trees;
3) Establish an upper diameter limit of 18" or less;
4) Do not degrade or remove any Spotted Owl Suitable Habitat;
5) Do not disturb or remove any DWD larger than 15 inches;
6) Ensure that prescribed burning in Slender Salamander Habitat will only occur during times they are not surface active;
7) Create a long-term fire management plan for the Mill Creek Watershed.

I. Proposed Action is not the best way to meet the purpose and need

A) The proposed "Fuels reduction" may increase fire risk

1. Fire behavior is influenced by multiple factors

In Bark's scoping comments, we noted that there is a lack of science supporting fuels reduction treatments as a method of reducing risk of crown fire. Specifically, studies have failed to demonstrate that fuel treatments significantly altered the behavior, spread, or severity of wildfire. It remains the case that the only support for the unsubstantiated speculation that fuel treatments might reduce crown fire hazard is relegated solely to "... informal observations, nonsystematic inquiry, and simulation modeling..." (Graham et al., 2004). Fire scientists acknowledge that no matter how well-planned a fuels reduction project may be, there still exists an unknowable fire environment at

the time wildfires encounter treatments. For example, the weather and wind conditions at a particular time, the attendant ignition location and direction of fire movement through the treatment, the degree of variability in the treatment conditions at the time of the fire – all these determine the performance of a fuel treatment in terms of the changes to fire behavior and effects. *Id.*

In their report, *Fire & Fuels: Does Thinning Stop Wildfires?,* the Wilderness Society concludes that fuels, topography and weather all affect fire behavior, with weather most of all. While fuels treatment can change the nature of fuels, and thereby change fire behavior, if it is hot, dry and windy, everything will burn. (2003) The Mill Creek Watershed Analysis also cites research showing that stand structure and fuel complex are largely irrelevant under extreme conditions in which essentially everything will burn until the weather changes. (WA, 32).

The PA gives a slight nod in this direction, recognizing that the information in Table 3.1-6 models dry fuel moistures*, but does not capture the most severe weather or fuel moisture conditions that would produce faster rates of spread, longer flame lengths, and more severe fire effects.* PA at 3-9 (emphasis added).

Despite the unpredictable nature of weather and fire, the PA makes several conclusory statements about how fire **would** behave as a result of the treatment.[1] Recognizing that fire behavior is more influenced by weather than any other factor, these conclusory statements lack credible scientific grounding. This is all the more troubling because these conclusions are simply based on "professional opinion". NEPA specifically requires agencies to disclose the scientific basis for its conclusions so the public need not blindly rely on FS expert opinions in determining the environmental impacts of a sale. A NEPA document that fails to disclose and analyze differing scientific opinions is defective. *Sierra Club v. Bosworth*, 199 F.Supp. 2d 971 (N.D. Cal. 2002); *League of Wilderness Defenders-Blue Mountains Diversity Project v. Marquis-Brong*, not reported, (D.Ore. 2003); and *League of Wilderness Defenders v. Zielinski*, 187 F. Supp. 2d 1263 (D. Ore. 2002).

2. Overstory removal may increase fire hazard

Fire scientists have made it clear that "fuels reduction" projects that include large tree removal and opening the canopy may increase fire hazard. Fuels treatments that reduce stand density and open up the forest actually enhance fire spread, as an opened forest allows fuels to dry out faster and winds to blow

[1] Proposed Action treatments **would** result in a moderate to significant reduction in rate of spread and in all but a few cases;
Proposed Action treatments **would** result in a moderate to significant reduction in flame length. 3-11
Proposed Action **would** result in a decreased resistance to control. 3-12

through the stand, which cause fire to move more readily through an open environment. (Morrison and Smith, 2005; Rhodes, 2007). Large (>20" dbh) trees that have survived numerous fires are a key barometer of ecological health and fire resilience in conifer forests. (Arno 2000, Brown et al. 2004, Frost and Sweeny 2000, Willis and Stuart 1994). Stands containing such trees typically possess structural characteristics including high closed canopies and large down wood that inhibit high intensity fire behavior (Agee et al. 2000, Graham et al. 2004). Shade provided by a closed canopy shields the ground surface from direct solar radiation, reduces ground temperature, and increases relative humidity as well as fuel moisture, all of which help prevent the spread of fire. (Countryman 1955).

Although the assertion is frequently made that reducing tree density can reduce wildfire hazard, the scientific literature provides tenuous support for this hypothesis. (Carey and Schumann, 2003). The Forest Service fails to adequately disclose the varying peer reviewed recommendations and ongoing scientific controversy about the role of mechanical fuels treatment in reducing the risk of fire in the project EA, instead relying on un-supported "professional opinions" that the public can neither substantiate nor challenge.

The EA fails to adequately describe, analyze and disclose the potential for increased future fire risks in the stands proposed for heavy thinning. Reduced canopy closure can, and generally does, result in increased drying and heating of the forest floor by both direct sunlight and increased wind velocity. Increased sunlight penetration following canopy reduction often results in the growth of understory species, which can dramatically increase the risk of canopy fires in the remaining trees.).

This set of risks are present both in the sort term, from increased surface fuels from 2-5 years after the treatment, and in the long term from micro-climate drying and ingrowth of vegetation. The PA does not discuss, propose, or commit to such actions to address the reasonably foreseeable increases in fire risk as a result of Project activities. The closest it comes is stating that, "[i]n time surface fuel loadings **could** be reduced through maintenance prescribed fire entries." PA at 3-15. The Forest Service should change that "could" to a "would" to ensure long term fire resiliency in the ecosystem.

B) Thinning from below, and removal of ladder fuels are most effective fuels reduction practices

1. Thinning small diameter trees from below is more effective than overstory removal

Both during the collaborative group and in our scoping comments, Bark has advocated for a fuels reduction project based in fire science that minimizes

environmental impact. To reach this goal, we advocated for an upper diameter limit of 18" to minimize overstory removal and loss of fire resilient trees. While not requesting a diameter limit, the Collaborative Group recommended that variable-density thinning of plantations that focuses on trees less than 12" dbh and coupled with fuels abatement should occur. The Collaborative Group also recommended that thinning in non-plantation stands should target younger and smaller-diameter trees in the stand that have become established since the exclusion of fire. (SFMC Collaborative Group Report).

In its PA, the FS asserts that establishing an upper diameter limit would not meet the purpose and need. "*For example, trees over the diameter limit that are lending*[2] *and would increase the risk of crown fires would remain. Also, the overstocked and dense stands would remain and the hazardous fuels associated with the standing trees (fuel ladders) would not be removed."* PA at 1-17. However, the PA offers no factual basis for these assertions, nor any reason why ladder fuels could not still be removed, and fails to consider the substantial body of science that concludes that thinning the understory is more effective at reducing fire risk than thinning the overstory. (See, e.g. Carey and Schumann, 2003).

Of specific note is the *Guide to Fuel Treatments in Dry Forests of the Western United States*, published by the Forest Service in 2007, which elaborates on the "thin from below" concept and specifies that upper diameter limits on tree removal are, in fact, consistent with the purpose and need for The Dalles II Watershed Project.

Thinning from below refers to removal of stems starting from smallest to increasingly larger stems until the target density is reached. In practice, thinning from below often has a d.b.h. limit below which no stems are harvested, with that lower limit set to reduce costs and maximize value of harvested material. In *Guide* scenarios, all stems are harvested starting with trees smaller than 1 in d.b.h., then proceeding to larger stems. For all thinnings, no trees larger than 18 in d.b.h. are allowed to be harvested. This limit is intended to retain larger, more fire-resistant individuals. In practice, this upper d.b.h. limit could be higher or lower depending on local harvest specifications and resource objectives. (Johnson, et.al. 2007). Note that the Forest Service researchers do not agree with the position of the Mt. Hood National Forest position that limiting the size of trees to be removed would "hinder attainment of the purpose and need." The *Guide* suggests that thinning "from below" to a density of 50 to 100 trees per acre and associated surface fuel treatments can effectively alter potential fire behavior from crown to surface fire under severe weather conditions for up to 40 years, depending on localized plan responses. *Id.* In every scenario examined by those researchers, an upper

[2] We're not sure what a "lending" tree is. Please explain.

diameter limit of 18" dbh was applied to treatments. The USFS has a burden to justify contradicting its own experts, and it fails to do so in The Dalles II PA.

We support thinning and the use of prescribed fire to increase resiliency, but the reasons provided for removing canopy and large old growth trees are not based in science. Again, peer-reviewed science concludes that large trees - including true firs - provide key habitat in a fire resilient ecosystem. This is also important for the discussion of habitat provided by large old snags, as efforts taken to remove them are detrimental to forest health:

> Attention should be given to protecting large and old trees. Large fir trees, especially those with heartwood decay, provide important habitat for many species, and efforts to "cleanse" the landscape of true firs should be avoided. Strategic location of fuel treatments may slow the spread of fire across the landscape, but this concept has been explored only in computer models and needs refinement before being extensively applied. Brown, et al, (2004) (internal citations omitted).

2. Reducing ladder fuels is most effective way to prevent crown fire
Omi and Martinson (2002) sampled several wildfire areas in the western U.S. to describe the effectiveness of fuel treatments on subsequent fire severity. The strongest correlation they found was that between crown base height and "stand damage," which they used as a measure of severity. Importantly, crown bulk density was not strongly correlated to fire severity. Instead, height to live crown, the variable that determines crown fire initiation rather than propagation, had the strongest correlation to fire severity in the areas sampled. Especially crucial were variables that determine tree resistance to fire damage, such as diameter and height. The study concluded "fuel treatments" that reduce basal area or density from above (i.e., removal of the largest stems) will be ineffective within the context of wildfire management.

A key implication of the study is the importance of treating fuels "from below" in order to prevent widespread occurrence of stand replacing wildland fires. Keyes and O'Hara concur that raising a stand's crown base height is critical, and argue, "pruning lower dead and live branches yields the most direct and effective impact." (2002:107). The Forest Service has provided no reason that it cannot focus on removal ladder fuels, in the context of a d.b.h. limit, and thus decrease the "height to live crown ration" while retaining the overstory canopy.

C) Project Units in Fire Condition Class 1 should be removed from the project.
The South Fork Mill Creek Collaborative agreed that portions of the South Fork Mill Creek Watershed are in Fire Condition Class 2 or 3 indicating that these areas have missed one, two or more fire cycles resulting in a build up of fire fuels. However, it recommended that ground surveys by the Forest Service were needed to confirm Fire Condition Class (FCC) before any treatments occurred because of concerns regarding the coarse mapping used to determine FCC. It

also stated that the highest priority stands for treatment must irrefutably be FCC 3 based upon field surveys. Did the Forest Service do ground surveys, upon which they based their classifications of FCC?

While the PA did not include a map that overlaid project units on FCC, by laboriously comparing Figure 1.6 (project units) with Figure 3.1-2 (FCC) it appears that there are many units in areas that are primarily FCC 1 (Fire regimes within or near historical range). These include units 130, 47, 140, 34, 131, 42, 41, 32, 120 and 22. Bark requests both a better map, which shows both FCC and the units, and if indeed there are units that are majority FCC 1 that these be removed from the project.

D. Lack of long term planning does not meet Purpose and Need

While the PA does not speak directly to future fire management plans, it alludes to a future of full fire suppression, eg, "Proposed Action treatments would . . . increase opportunities for firefighters to directly suppress wildfires . . ." PA at 3-12. Does this mean that the Forest Service is committed to retaining a complete suppression plan for any fires in the watershed? How would this not replicate the very situation the proposed action seeks to remedy?

Recognizing that aggressive wildfire suppression must continue to occur throughout the watershed and adjacent areas until a Fire Management Area Plan is completed, the Collaborative Group recommended the development of a fire management plan. Bark concurs, and suggests that to better meet their purpose and need, the Forest Service must create such a plan – including increased adaptive monitoring, wildland fire management not based wholly on suppression, and a contingency plan, should a stand replacing fire occur in the watershed.

II. The Dalles II Project Unnecessarily Degrades and Removes Sensitive Species Habitat

A. Spotted owls will be harmed by the Project

The proposed project would impact or remove over 1000 acres of Northern Spotted Owl (NSO) dispersal and nesting habitat, primarily as the result of opening up canopy and removing snags and DWD. Specifically, there would be a total degradation/loss of 785 acres of NSO dispersal and 575 degradation/loss of NSO suitable habitat, for a total of 1360 acres of degraded habitat. PA at 3-99.

The MHNF LRMP requires that habitat for threatened, endangered and sensitive plants and animals *shall be protected and/or improved*. FW-175 (emphasis added). This project does neither. The PA tries to minimize this impact by labeling the habitat loss as "temporary" and asserting that the habitat will recover from 15-50 years hence. While it is arguable that 50 years

of habitat loss is "temporary", especially for a threatened species, by deeming the loss "temporary" the Forest Service is placing itself in a Catch-22. Either the Forest Service intends to maintain the ecosystem with the more open canopy they assert is needed for crown fire prevention and thus the habitat loss is permanent, *or* the Forest Service is admitting that it will not be maintaining the treatments and the canopy *will* grow back to once again provide NSO habitat. It cannot be both ways.

If this project is indeed necessary to protect watershed health (an assertion with which Bark disagrees), the Forest Service must have a plan in place to provide the ongoing maintenance needed, otherwise it is simply a one-time, wasted effort. However, keeping the canopy permanently reduced is outside of the scope of consultation with FWS, and if there is going to be a permanent habitat loss, then agency needs to re-initiate consultation, as per 50 CFR 402.16.

In addition, guidance in the HFRA and NSO Recovery Plan provides all the more reason to retain large old growth trees to promote fire resilient forests. Many of the units are within the 1.2 mile radius (~3000 acres) home range of historic nest sites. PA 3-99. There are 4 NSO home ranges currently below 40 percent suitable habitat and Project would further reduce the amount of suitable habitat available to those territories. The PA tries to minimize this impact by stating that since the sites are already degraded, they may not house owls, so further degradation won't have much impact. It also notes that reducing the amount of suitable habitat in 6038P90 may prevent this nesting pair from being able to successfully nest and produce young. PA at 3-100. However, the NSO Recovery Plan specifically recommends that the agency addresses the downward demographic trend [for NSO] by *protecting known spotted owl sites* in addition to the retention of structurally-complex forest habitat. NSO Recovery Plan III-42 (emphasis added). There is no need for forestry "improvements" that do not aid in the recovery of the NSO.

In this analysis area, the limiting factor for spotted owls is the lack of spotted owl suitable habitat and lack of connectivity between these suitable habitat blocks. PA at 3-100. In this context, the degradation/loss of 575 acre of NSO suitable habitat is especially troubling. The PA asserts that "in the long term, thinning treatments in dispersal habitat would accelerate the development of suitable spotted owl habitat." Id. However, the "long term" is not the appropriate time frame for animals that are threatened with extinction. The time to protect and restore their habitat is **now** to ensure that there will be a "long term" for the owls.

The PA's conclusion that "spotted owls would continue to persist in the watershed because active management to reduce the risk of wildfire and insect outbreaks is expected to offset the risks of habitat loss," PA at 3-101,

completely fails to recognize that owls may actually *benefit* from wildland fire, as laid out in the NSO Recovery Plan, which states:
III-30 – "For spotted owls nesting in burned areas, reproductive rates are generally similar to unburned areas (Gaines *et al.* 1997, Bond *et al.* 2002, Clark 2007)."
III-30 – "Bond *et al.* (2009) found owls selecting burned areas, including high-severity burns, over unburned areas for foraging when those areas were within 1.5 kilometers of a nest roost site."
III-31 – "There is evidence of spotted owls occupying territories that have been burned by fires of all severities."

Even in the absence of the benefit that wildland fire can provide to owl habitat, we are concerned that the overstated threat of wildfire in the PA is causing equivocation in determining what really will threaten the NSO. On one hand, the No Action Alternative contends wildfire will almost certainly be high intensity and remove habitat, large snags and DWD harming the spotted owl, on the other hand, the action alternative contends that removing the DWD, opening the canopy, and causing adverse impacts for decades to the NSO and its prey is justifiable in order to avoid the threat of fire. The FS is simply proposing to remove and degrade the NSO habitat long before a wildfire may.

Without studies to show how proposed treatments will benefit the NSO, this decision is sorely at odds with the NSO recovery strategy. In order to protect NSO habitat and simultaneously protect against the threat of wildfire, the purpose and need for the project should be to focus on removing ladder fuels and small diameter trees, while maintaining old growth. Degrading functional NSO habitat for years under the guise of increasing fire resiliency does not make sense when there is ample acreage nearby that could likely benefit from thinning and fire resiliency, without the possibility of incidental take and adverse impacts to the NSO. Significantly decreasing the canopy through overstory removal of large trees is inconsistent with HFRA objectives and does nothing to protect NSO and old growth dependent species.

B. Sensitive Salamanders will be harmed by the Project

The Sensitive Species Program was developed to meet obligations under the ESA, the NFMA and Forest Service national policy direction as stated in the FSM Section 2670, and the USDA Regulation 9500-4. The Sensitive Species Program is supposed to be a proactive approach to conserving species to prevent a trend toward listing under the ESA and assist in providing for a diversity of plant and animal communities [16 USC 1604(g) (3) (B)] as part of the multiple use mandate and to maintain "viable populations of existing native and desired non-native species in the planning area "as required by NFMA" (36 CFR 219.19). Specifically, the MHNF LRMP requires that habitat for threatened, endangered and sensitive plants and animals *shall be protected and/or improved.* FW-175 (emphasis added).

The Dalles II Project fails to meet this direction and will degrade or remove habitat for the Oregon slender salamander. In the western Cascades, four habitat characteristics have a significant positive association with Oregon slender salamanders: canopy closure, west and east aspects, decayed logs in the 50 to 75 cm (20 to 30 in) diameter class, and snags. (Conservation Assessment for the Oregon Slender Salamander, 2009). The PA acknowledges that the proposed project would remove approximately 224 acres of habitat for Oregon slender salamander by removing down wood and reduce canopy closure on these acres, which would eliminate suitable habitat for this species. The PA states that other existing habitat will not be impacted, but this does nothing to mitigate the loss of 224 acres. PA at 3-102.

The PA says nothing about the impact of prescribed burning on salamanders, though they are moist little critters who need the refuge of large DWD to protect them from fire, nor does it disclose why there won't be impact to the salamanders throughout the entire project area from removal of canopy, snags and DWD. According to the Conservation Assessment, the effects of fire on Oregon slender salamanders are poorly understood. Low intensity fires that retain large down wood and occur during the seasons when these salamanders are not surface active may not have adverse effects. (Conservation Assessment, 2009). Bark requests that the Forest Service leave DWD in sufficient quantity across the project area, and leave sufficient canopy closure, to result in no habitat loss for the Slender Salamander, and to ensure that prescribed fire would only occur at times when the salamanders are not active on the surface.

C. Project will not comply with Forest Plan Guidelines for Snags and DWD

Large down logs are not only essential for salamander habitat, they help slow the spread of fire by slowing sub-canopy horizontal wind movement and fire spread, and storing enormous quantities of water that deprive fire of heat energy. (Amaranthus 1989). The Dalles II project area is already far below the threshold for down woody debris, and this project should follow the recommendations of the South Fork Mill Creek Collaborative Group for DWD and snag retention.

Specifically, the Collaborative Group recommended adopting the downed wood targets presented in the table below, and the prioritization criteria outlined in the attached document titled *South Fork Mill Creek Collaborative Working Group - Final Woody-Debris Reduction Recommendations*. Retained downed wood shall represent the largest diameter classes available.

Elevation zone	**Coarse Woody debris target**
Below 3000'	5-15 tons/ac
3000' to 4000'	<20 tons/ac
Wet sites above 3600'	15-25 tons/ac

The Collaborative Group also recommended that the Project retain all sound snags of the largest diameter class available and of the tree species present that will persist the longest into the future.

In addition, Bark is concerned that the project will not only decrease existing snags and CWD but also limit future recruitment of these two essential habitat components. The Forest Service admits that as a result of this project, the recruitment of down wood would be delayed because of the reduction in density of the stands which would reduce the levels of suppression mortality. Although some trees with elements of wood decay would be left to provide habitat for snag-dependent species; fewer new snags, trees with elements of wood decay, or down wood would be recruited for the short to mid-term. FS Response to Comments.

In the context of an area that is already significantly under the meet Mt. Hood Forest Plan standards for snags and DWD[3] and well below historical amounts, the Forest Service has not provided a compelling reason for an exception to these standards in the name of "effective fuels reduction. Bark requests that this project be amended to retain both existing snags and DWD, and to leave sufficient tree density for high levels of future recruitment.

Conclusion

In close, Bark agrees that the Forest Service's past, and continuing, policy of fire suppression has created an imbalance in fire-prone ecosystems that needs to be remedied. We also agree that protecting water quality in municipal watersheds is of utmost importance, and support the Forest Service's efforts to protect water in all of the lands under its management. However, there is insufficient evidence to suggest that The Dalles Watershed Phase II Hazardous Fuels Reduction Project accomplishes the goal of protecting drinking water through creating a more fire resilient ecosystem.

The Forest Service's adherence to overstory removal as a key strategy for "fusels reduction" flies in the face of well-established fire science, including the Forest Service's own fuels reduction guidelines. Overstory removal not only doesn't significantly decrease the chance of severe fire, it may increase the very conditions that make severe fire more likely to spread. In addition, it decreases habitat for imperiled species, such as the Spotted Owl and Oregon slender salamander.

Bark hopes that the Forest Service will take a step back from its current proposal and craft a fuels reduction plan that achieves the goals of increased

[3] The PA acknowledges most treatment units will not meet Forest Plan standards, post-treatment. PA at 3-115.

fire resiliency without adverse environmental tradeoffs. Thank you for your consideration.

Sincerely,

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