

D-Bug Citizen's Alternative

March 8, 2010

Summary Statement:

The D-Bug Hazard Reduction Timber Sale attempts to achieve the laudable goal of reducing the threat posed by potential wildfire to cabins in the Diamond Lake area of the Umpqua National Forest. Unfortunately, as currently proposed, the project is incongruous with that goal. By pairing necessary thinning near structures and roads with commercial logging in backcountry areas, the project unnecessarily compromises the aesthetic, environmental, and recreational values of some of the country's most pristine backcountry at taxpayer expense. It is also likely illegal. As such, the project has become controversial, and if it goes forward as currently envisioned, is likely to result in litigation and conflict.

In an effort to avoid that outcome, 16 organizations have developed the following "citizen's alternative" proposal. By reducing the scope of the project to focus treatments on fuel reduction near structures and egress routes, planning for emergencies, re-introducing natural processes in the backcountry, striving for more resilient habitat, and following the spirit and letter of current laws, rules, and regulations the project would achieve its stated goal without compromising the public trust or degrading the landscape. Such a project would also win the support of the submitting organizations.

General themes

1. The primary purpose and need of the D-Bug project should be to protect homes, structures, and egress routes from demonstrably legitimate and urgent threats from wildfire while protecting unroaded and unmanaged forests and restoring ecological integrity with a high degree of reliance on natural processes.
2. Wood products should strictly be a by-product of activities that are ecologically needed and not an explicit or undeclared primary goal.
3. Fire, fuels, and beetles are just components of a more complete and accurate conception of ecological health that recognizes the important roles of native insects, dead trees, and ecological processes like fire.
4. Beetle activity does not always result in increased fire hazard. Some effects of beetles and fire are considered adverse from the stand point of individual tree health, but are actually beneficial from the standpoint of habitat value and landscape diversity.
5. Logging does not always have the desired effects on beetle mortality or resultant long-term fire hazard. Further research is needed on this subject, but some of the country's most pristine and prized backcountry is not the place to conduct such experiments.
6. All prescriptions should strive for biodiversity in all its dimensions: e.g., species diversity, and spatial variability at multiple scales.
7. In today's economic and political climate, this project must be fiscally and socially responsible. Spending scarce tax dollars on large projects requiring new or temporary roads when the Forest Service is struggling to maintain existing roads is not fiscally responsible. Tying unnecessary and controversial logging to necessary and appropriate thinning projects is not socially responsible.

Unroaded areas

8. The FS should carefully inventory the unroaded areas in the project area and move the boundaries to encompass the full extent of the de facto unroaded areas, i.e., the edge of roads and regen harvest units.
9. Allow natural processes to operate where possible. Avoid treatments in all unroaded areas, including: inventoried roadless areas (e.g., Mt Bailey and Thirsty Creek), potential wilderness adjacent to Crater Lake National Park, and OCRA (near Mt Thielsen). Allow removal of small trees within one site potential tree height of existing well-travelled roads. To help protect the cabins, allow non-commercial mechanical fuel treatments above the loop road and below the bike path in the Mt Bailey IRA.
10. Permanently close the roads that frame the Thirsty Creek IRA on the north, south and east, or turn these roads into a loop trail for hiking.
11. Do not log along the roads framing the Thirsty Creek IRA.

Outside of roadless areas

12. Focus on areas accessible from existing roads.
13. Do not build new roads or re-establish old roads.
14. Do not build extensive networks of skid trails.
15. Do not use hiking trails as logging roads.
16. Restoration should be targeted to stands that have been highly modified by past logging and road building.
17. **Plantation thinning:** There are a lot of plantations north of Diamond Lake and west of Lemolo Lake that could be *carefully* thinned to enhance habitat development, create jobs, and produce reasonable amounts of wood products. Some of this thinning will be commercial, some non-commercial.
18. **Lodgepole restoration:**
 - a. Lodgepole typically grows in dense even-aged stands that become susceptible to stress, beetles, and fire which eventually change them into early seral forests. This is a natural cycle that needs little if any intervention. Mature lodgepole is not always a fire hazard. Mature lodgepole stand conditions can be naturally fire resistant. Even beetle-infested and burned lodgepole provide wonderful habitat for certain species such as American marten and black-backed woodpeckers. Overstory removal, shelterwood, seed tree are not an appropriate prescription for lodgepole because they reduce or eliminate complex forest structure in the form of live and dead trees.
 - b. Away from roads, allow natural successional processes to maintain and renew the lodgepole forest cycle. Retain large tree structure even if the large trees are presumed to be unhealthy. Even when individual trees are unhealthy from an organism standpoint, large trees contribute to ecological health at the stand and landscape level.
 - c. Near roads, appropriate goals might be shaded fuel breaks or hazard tree removal. See below. The most appropriate treatments are to thin from below. Do not assume that all lodgepole larger than 8" dbh is "dead and doesn't know it."
19. **Mixed-conifer restoration:** Fire exclusion may have had some adverse effect on mixed conifer in the D-Bug project area, but not as much as logging. Past fire was always variable, so dense patches of forests are not atypical. To enhance the shade-intolerant species component, we recommend thinning a portion of mixed conifer stands from below using a two-tiered system of diameter limits, such as 15" dbh limit for early seral species like Ponderosa pine and Douglas fir, and a 20" limit for shade tolerant species like grand fir-white fir.

20. **Shasta red fir:** These are relatively high elevation forests with long fire return intervals and they will not be improved by logging. Focus any treatments within one tree length of existing roads and retain all large trees and most medium-sized trees.
21. **Suitable spotted owl habitat:** To address the rapidly increasing threat of the barred owl, the FS should conserve all suitable owl habitat and try to recruit more where possible in order to alleviate competitive interactions. Suitable owl habitat generally is enhanced by high canopy closure and high incidence of dead trees and down wood. Focus any treatments within one tree length of existing roads and retain all large trees and most medium-sized trees.
22. **Riparian Areas:** Delineate all riparian reserve boundaries and rigorously apply the Aquatic Conservation Strategy. The general rule is that no logging is allowed unless ACS objectives would not be met in the absence of silviculture.

Fire and Fuels

23. Develop a strategy to safely reintroduce natural processes like fire. Design fire breaks and fuel treatments not with the intent to further exclude fire, but to restore a more natural fire regime.
24. For fuel breaks, rely on existing roads and adjacent areas along main roads that are already cleared. Create shaded fuel breaks within 200 feet of strategically chosen roads. Shaded fuel breaks should retain relatively high canopy cover to help maintain a cool, moist understory, and to suppress the growth of ladder fuels, and lower future maintenance costs.
25. For public safety, develop an evacuation plan, and remove hazard trees along well-traveled roads.
26. To protect structures, work with property owners to treat and maintain the ignition zone within 200 feet of structures.
27. Work with the cabin owners and resort owners on appropriate and acceptable fuel prescriptions affecting their homes, businesses, and the recreational enjoyment of the area. Cabin owners may have particular interests between Diamond Lake and the road. Recognize that forest users may be relatively tolerant of the risks presented by natural processes like beetles and fire.
28. To help protect the cabins, allow non-commercial mechanical fuel treatments above the loop road and below the bike path in the Mt Bailey IRA.

HFRA

29. This project is being developed under the Healthy Forest Restoration Act and must carefully follow its requirements, including the mandate to “fully maintain” old-growth, maximize the retention of large trees, focus on real insect “epidemics” (rather than “outbreaks” which are a natural ecological process that does not need intervention), and the HFRA requirement of forest plan consistency.
30. The old-growth and large tree requirements must drive project design. For instance, mature lodgepole stands should be targeted for conservation rather than heavy thinning. Old growth forests, by definition, include both live and dead trees that must be continuously recruited. In mixed conifer stands, the FS needs to retain enough medium-sized trees to ensure recruitment of optimal levels of large live and dead trees.
31. The HFRA prohibition on plan amendments means that the FS cannot violate scenic standards, create oversized openings, or redefine lodgepole stands as part of the timber base.
32. Beetles are a native and endemic species with an episodic pattern of outbreaks. The current beetle outbreak does not seem severe at the present time. The hard winter of 2008-2009 may have set back the population. HFRA authority only extends to epidemics, not outbreaks, and these terms are not synonymous as asserted by the Bush administration.

Carbon Storage and Climate Change

33. Since forests are an important part of the global carbon cycle that in part determines our climate, the D-Bug landscape plan should strive to store optimal levels of carbon. Scientists have scrutinized forests and forest management from many angles and the evidence shows that logging virtually always accelerates the transfer of carbon from the forest to the atmosphere, and the best way to store carbon in forests is by minimizing management interventions that kill trees, remove biomass, and disturb soil. This does not mean that forest management should be excluded but that it be targeted to locations where intervention is clearly needed to fulfill an over-riding public need, such as fuel reduction in the immediate ignition zone around homes and removing hazard trees along well-travelled roads and establishing shaded fuel breaks that are not too wide along main roads and escape routes.