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December 15, 2002

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**Subject: Toolbox Fire Recovery Project**

Dear District Ranger:

Oregon Natural Resources Council (ONRC) request that the following issues be considered in the scoping process for the **Toolbox Fire Recovery Project**. Please refer to the ONRC scoping letter dated 2/16/00 for more details and additional scoping comments. (If you have misplaced your copy of the letter, you can access it at the following website: <http://www.onrc.org/scoping/>.)

**If this project involves post-fire salvage logging please carefully analyze and take the following into account:**

Please consider the many reasons **NOT** to salvage (including but not limited to adverse impacts to soil, water quality and run-off timing, vegetative recovery, loss of legacy structures, loss of nutrients, loss of terrestrial and aquatic habitat structures at the site and landscape scales, loss of partial shade that protects the next forest, increased fine fuels on the forest floor, loss of seed sources, and microsities) and compare these to the few reasons to salvage (economic recovery of fiber).

The recommendations of the Beschta report must be carefully considered. See Beschta RL, Frissell CA, Gresswell R, Hauer R, Karr JR, Minshall GW, Perry DA, and Rhodes JJ. 1995. Wildfire and Salvage Logging: recommendations for ecologically sound post-fire salvage logging and other post-fire treatments on Federal lands in the West. Corvallis, OR: Oregon State University. Also available at: [http://www.fire-ecology.org/science/Beschta\\_Report.pdf](http://www.fire-ecology.org/science/Beschta_Report.pdf)

Please consider at least one non-commercial, restoration-only alternative that invests in restoration and recovery of the fire area by, for instance, eliminating livestock grazing, emphasizing native species recovery, not building any new roads, stabilizing soils disturbed by the fire suppression effort, decommissioning unneeded roads, and limited contour felling that leaves the large trees standing.

Please consider the following issues supplemental to the original scoping letters. The scoping letters will be updated on the website as changes arise. New information to look for includes:

**Roads EA** – The Forest Service is required to justify the need for new roads and prioritize efforts to maintain and decommission roads considering environmental and economic implications. (The EA/EIS must clearly state whether any roads are proposed for construction or reconstruction within Riparian Reserves, and which of these if any will require stream crossing(s).)

Please address the issues raised in the original scoping letter when writing the EA/EIS. Here are some highlights from our 2/16/00 scoping letter.

**Roadless/Wilderness Areas & Road Building Issues**

- Avoid timber harvest, roads, mining, development and motorized recreation in roadless areas  $\geq 1000$  acres or any roadless area adjacent to existing wilderness or parks and all inventoried roadless areas. The EA/EIS should clearly state whether the project is in any portion of a roadless area inventoried during the RARE II process, or in a non-inventoried roadless area  $\geq 1000$  acres or adjacent to inventoried roadless or designated wilderness. A full EIS should be prepared for this project if it involves entry into an inventoried or uninventoried roadless area.

**Old-growth**

- Avoid commercial timber harvest, roads, and mining in late-seral forests.
- Impacts on old-growth species should be discussed in detail in the EA/EIS. This should include an analysis of effects on such species as the goshawk, bats, Canada Lynx, woodpeckers, Pine Marten, California Wolverine, Great Gray Owl, Pygmy Nuthatch or Bald Eagle, and other special status species listed in applicable management plans. Special attention to snag habitat is needed.

**Fish & Wildlife** – Special status species surveys must be completed prior to developing NEPA alternatives and before the decision is determined. On-the-ground field reconnaissance surveys must be done and used to develop NEPA alternatives.

**Water Quality** – Project analysis should separately discuss Riparian Management Objectives (under PACFISH and INFISH) and how the proposed alternatives will impact these objectives. Any commercial harvest activities or road construction in key watersheds or municipal watersheds should be avoided in order to protect water quality.

**NEPA Documentation** – A full range of action alternatives should be considered for this sale. These alternatives should include wildlife enhancement, restoration, old growth protection (minimum fragmentation), and non-motorized recreation.

ONRC also sent a scoping letter specific to lynx concerns dated January 11, 2000. We incorporate that letter here by reference. This letter is also available on the web at: <http://www.onrc.org/scoping/>.

Please send us a copy of the EA/EIS when it is completed.

Sincerely,



Leanne Siart  
Conservation & Outreach Coordinator  
ONRC Western Field Office

And for,

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