

**Public Correspondence
received as of March 9, 2007**

JEWELL MEADOWS WILDLIFE AREA

WHAT DO YOU THINK ABOUT WILDLIFE AREA MANAGEMENT?



The Oregon Department of Fish and Wildlife is seeking your comments regarding management of Jewell Meadows Wildlife Area. You can add your comments to the record by completing this form and turning it in tonight, faxing it to ODFW at 503-947-6009, or by sending an e-mail to ODFW.comments@state.or.us. All comments will be summarized and posted to the ODFW Web site.

Allan Foster - More info at kiosk on other species (Non Game). Thought overall the wildlife area plan was well written.

WENAHA WILDLIFE AREA

WALLOWA COUNTY NATURAL RESOURCE ADVISORY COMMITTEE

Wallowa County Board of Commissioners
101 S. River Street * Enterprise, Oregon 97828
(541) 426-4543 Ext. 11 * (541) 426-0582 - fax

February 27, 2007

**ADAPTIVE
WATERSHED
MANAGEMENT**



Based on hope
Instead of fear

*

On solutions
Instead of conflict

*

On education
Instead of litigation

*

On science
Rather than emotion

*

On employing
Human resources rather
Than destroying them

Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, Oregon 97303

e-mail: ODFW.comments@state.or.us

RE: Wenaha Wildlife Area – Management Plan

Dear Oregon Fish and Wildlife Commission:

The Wallowa County Natural Resource Advisory Committee, who advises the Wallowa County Board of Commissioners on natural resources issues, supports the Oregon Department of Fish & Wildlife's efforts to manage our States' wildlife areas in an environmentally friendly manner for the benefit of wildlife. We support the proposed management plan update, but have suggestions for consideration in the final management plan.

Objectives and Strategies

Strategy 2. Survey and identify age class, stand type, and condition of timber stands to determine necessary silvicultural practices to improve and increase wildlife habitat, improve forest health, control insect infested and diseased stands of timber, and reduce fire danger.

Strategy 3. Develop plans for timber salvage operations to restore and recover forest lands burned by fire.

Suggestions

1. Contact the Oregon Department of Forestry to pursue cost-share availability. If available, funding would cover 75% of the cost to develop a new Stewardship Plan with a private contractor. ODFW could also pursue grant funding thru other partnering entities if financial help is unavailable from ODF.
2. The use of stewardship contracts, along the lines of those being used by the USDA Forest Service, would allow the use of goods for services. Use the timber removed to enhance and maintain improvements to the wildlife area with excess timber receipts going to the State fund.
3. In order to identify and implement additional restoration or enhancement projects, we recommend relying on local knowledge and additional partners.

S
incerely,

Bruce Dunn

NRAC Chairman

Liz Bueffel

From: Nancy Breuner
Sent: Wednesday, March 07, 2007 4:53 PM
To: Liz Bueffel
Subject: FW: Wenaha Wildlife Area
Importance: High
Attachments: salvage science effects.doc

From: ODFW Comments
Sent: Friday, February 09, 2007 3:58 PM
To: Nancy Breuner; Eric Rickerson
Subject: FW: Wenaha Wildlife Area
Importance: High

From: Larry McLaud [mailto:larry@hellscanyon.org]
Sent: Wednesday, February 07, 2007 3:59 PM
To: ODFW Comments
Cc: coggins@oregontrail.net; ELY Craig
Subject: Wenaha Wildlife Area

Wenaha Wildlife Area Draft Management Plan.

Please accept these comments on the draft management plan for the Wenaha Wildlife Area from Hells Canyon Preservation Council, a non-profit conservation group working to protect wildlands, wildlife and quality of life.

I have visited this area many times over the last 12 years and expected the area to be managed for the protection of wildlife. I expect most of the public would have the same assumption. After reading the draft plan, it seems this so-called wildlife area is being managed for cows, logging, trapping and the control of predators. This would likely be somewhat of a shock to citizens who fund the management..

The numbers of the public who use the area are either consumptive or non-consumptive. The non-consumptive users far outnumber the consumptive users 5 to 1. The long term sustainability of the area would favor non-consumptive users.

ODFW mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. This draft management plan seems to be contrary to this mission. The draft plan seems to also go against the purpose and need – "The natural resources on the WWA need to be managed in such a manner as to protect, maintain, enhance and restore fish and wildlife habitat to support optimum population levels of all species for the enjoyment of present and future citizens." A few examples going against the mission include grazing, logging, trapping and killing of predators. Most citizens who pay for this wildlife area do not support these activities.

Supplementation of feed for elk to support an unsustainable population is meddling with the natural functions and processes of the ecosystem. Many adverse consequences may result from this practice including but limited to disease transmission and predator increases above a natural level. Many respected wildlife biologists are against this idea. Supplementation to keep elk off of private lands seems to be a subsidy of private livestock producers at a cost of taxpayers and the healthy functioning of the wildlife area. Times have changed since the 1950s and there are far less livestock in the Grande Ronde Valley that need protection from elk.

3/7/2007

The draft plan is silent on the motorized vehicle issue. I suggest there be a management plan for motorized vehicles included in this management plan.

The draft plan seems to assume salvage logging will restore and recover forest lands burned by fire. There is a great deal of sound science to refute this assumption. Salvage logging has caused far more damage to forest lands than it has ever helped. I suggest you read the Dr. Tim Ingalsbee article attached.

Grazing likely causes a great deal more harm than it can help. Cow dung in the streams that contain threatened and endangered species such as salmon and steelhead should not be acceptable in a wildlife area. Past impacts of grazing including non-native plant species and weeds should clearly point to the need to eliminate grazing in the area.

Trapping in the area should also be eliminated to protect an "optimum population of all species."

Strategy 4 under objective 2.2 basically supports killing of predators. This clearly violates the mission and most Americans did not support this practice and ¾ of the money to run this area comes from federal dollars.

The manager of the Wenaha Wildlife Area lives 3 hour drive away from the area. This is not conducive to effective management and ODFW should find a person committed to living and working at the wildlife area.

A wildlife area should be managed for the benefit of wildlife and the Wenaha area should be no different. This is an extremely valuable area for wildlife and should be managed to ensure the long term sustainability of all wildlife..

Thank you for the opportunity to comment.

Sincerely,

Larry McLaud
Ecosystem Conservation Coordinator
Hells Canyon Preservation Council
PO Box 2768
La Grande, OR 97850
541-963-3950 x 23

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SALVAGING TIMBER; SCUTTLING FORESTS

The Ecological Effects of Post-Fire Salvage Logging

by
Timothy Ingalsbee, Ph.D.
Western Fire Ecology Center
March 2003

INTRODUCTION

Most native species of plants and animals inhabiting forest ecosystems evolved with natural adaptations to the patterns and processes of fire disturbance and recovery.ⁱ One of the effects of fire disturbances is the creation of dead trees, both standing "snags" and downed logs. Fire-killed snags and logs serve vital roles in the structure and function of healthy forest ecosystems in general, and are especially important for natural recovery processes following fire events.ⁱⁱ They provide food and shelter to wildlife, fish, and numerous insects, microbes, and fungi that are vital to post-fire recovery and long-term site productivity, they help retard surface water runoff and help retain and build soil, they help cycle nutrients and water to plants and soil, and snags that fall across streams provide links between terrestrial and aquatic ecosystems.ⁱⁱⁱ Indeed, a forest ecologist could argue that for the sake of healthy wildlife and plant populations, fertile soil, and clean water, large-diameter snags and logs are some of the most valuable trees in the forest.

The vital ecological importance of snags and logs and other "course woody debris" (tree trunks and branches greater than three inches in diameter) has only been recognized since the late 1970s.^{iv} Unfortunately, the dominant view of forest managers since the 1930s has been that fire-killed trees are a wasted resource unless they are quickly "salvage" logged to extract their economic value for wood products. For decades the U.S. Forest Service and Bureau of Land Management have routinely salvage logged fire-killed trees using predominantly economic arguments, coupled with the assumption that the impacts of salvage logging were less harmful than "green tree" logging because the background effects of forest fires made the impacts of salvage logging relatively insignificant. However, this assumption that post-fire salvage logging causes "no significant effects" should be challenged by the growing weight of scientific evidence that demonstrates that salvage logging exacerbates the short-term adverse effects of fire, causes significant long-term environmental damage and ecological degradation of burned watersheds.^v

Given that the controversy over salvage logging has been growing since the big fires of the late 1980s,^{vi} forest managers and elected officials have raised a new justification for salvage logging that capitalizes on the public's socially-conditioned fear of forest fires: the "reburn hypothesis." This hypothesis argues that fire-killed trees pose an extreme fuel hazard and fire risk; therefore, by removing dead and dying trees salvage logging can reduce the probability of a future high-intensity wildfire. This is aptly called an "assumption"^{vii} or "hypothesis" because there currently is no support in the scientific literature demonstrating that the probability for high-intensity fires is greater for areas of abundant fire-killed snags and logs compared to salvage logged areas.^{viii} Indeed, there simply is not a strong scientific or ecological basis justifying post-fire salvage logging for fire risk reduction or ecosystem "recovery" objectives^{ix}

On the contrary, a review of the effects of wildfire and salvage logging by a team of prestigious forest scientists came to the conclusion that,

"Human intervention on the post-fire landscape may substantially or completely delay recovery, remove the elements of recovery, or accentuate the damage...In this light, there is little reason to believe that post-fire salvage logging has any positive ecological benefits, particularly for aquatic ecosystems. There is considerable evidence that persistent, significant adverse environmental impacts are likely to result from salvage logging."^x

The Beschta team stated that, "There is no ecological need for immediate intervention on the post-fire landscape," and advocated that "Human intervention should not be permitted unless and until it is determined that natural recovery processes are not occurring."^{xi} The Beschta team's report on wildfire and salvage logging constitutes some of the best available science on this topic, and has been the basis for several successful administrative appeals and citizen lawsuits that have challenged post-fire salvage timber sales.

In an attempt to address the controversies raised by the Beschta Report, the Forest Service conducted an exhaustive literature review of post-fire salvage logging, but found only seven studies worldwide that met minimum standards for scientific design, and concluded that "It is clear that information on the environmental effects of post-fire logging is scanty at best."^{xiii} Consequently, an understanding of the adverse impacts of post-fire salvage logging must be deduced from knowledge about the general environmental impacts of commercial logging on soils, streams, vegetation, and wildlife, coupled with an appreciation for the unique ecological values of fire-killed trees and the adverse effects on the structure and function of forest ecosystems from removing large dead trees.

The following provides scientific evidence to bolster the counterargument that, far from being an environmentally benign or beneficial management activity, post-fire salvage logging is one of the most harmful forms of commercial logging perpetrated upon the landscape.

SALVAGE LOGGING CAUSES SIGNIFICANT EFFECTS ON FOREST SOILS

Fires can cause short-term adverse effects on soils such as increasing erosion from removal of vegetative cover that exposes soils to rain and snowfall and subsequent runoff. These impacts vary depending on a number of environmental factors, including the severity of the fire, the steepness of slopes, natural erodibility of soil parent material, precipitation events, and other factors, but in general, burned soils are highly vulnerable to additional disturbance.^{xiii} Salvage logging displaces soil by felling and dragging large-diameter trees across the exposed ground surface, thereby directly initiating erosion. One of the natural recovery processes initiated by fires is that when large-diameter snags fall to the ground across the slope contour, they serve as natural check-dams that slow runoff and retain soil, which is especially important on steep slopes.^{xiv} Thus, salvage logging also indirectly facilitates erosion through removal of large snags and logs that would naturally slow overland flow and retain soil.

In a study that compared five different post-fire salvage logging methods on ponderosa pine sites in eastern Washington, conventional tractor-based systems disturbed nearly 75% of the area, and caused erosion on over 30% of the area, but even helicopter logging caused soil disturbance on 12% of the area.^{xv} In addition to erosion, salvage logging is also known to cause soil compaction.^{xvi} This also adversely impacts post-fire recovery and long-term site productivity by eliminating pore spaces in soil that retain air, water, and facilitate spread of fine roots. The result of decreased water infiltration and retention is increased surface runoff, sheetwash erosion, and subsequent sedimentation in streams.

Salvage logging also causes nutrient losses not only directly through removal of topsoil, but indirectly through the removal of snags and logs that function as a major source of soil organic matter and a long-lasting reservoir of essential nutrients for microorganisms, plants, and animals.^{xvii} In^{xviii} fact, in Douglas-fir ecosystems of the Cascades, up to 30% or more of upper soil layers are composed of old decayed logs. It can take several centuries, even millennia, for forest soil to develop the capacity to grow big, old trees. Thus, the problem with soil displacement, compaction, and erosion is that once topsoil has been removed from the ecosystem, it constitutes an irreplaceable loss of fertility and productivity, at least in human timescales.^{xix} Consequently, protection of the topsoil is a primary requisite for aiding post-fire recovery and maintaining long-term forest ecosystem health.^{xx}

SALVAGE LOGGING CAUSES SIGNIFICANT EFFECTS ON FOREST STREAMS

Fires can affect stream systems through increased erosion and sedimentation, and through changes in peak flows and water yields. When vegetation is killed, evapotranspiration is halted; thus, instead of plants taking up water through roots and stems, water remains in soil to flow along slope gradients into streams. Consumption of tree canopies by fire can eliminate their ability to intercept rain and snow, causing increased susceptibility to rainsplash and sheetwash erosion, and higher snowfall accumulations with more rapid spring snowmelt. Finally, high-severity fires create physical and chemical changes that can cause "hydrophobic" soil layers that repel water infiltration, and lead to more overland flow. All of these natural fire-related processes can increase surface water runoff, water yields and peak streamflows, leading to increased potential for erosion, landslides and floods, and subsequent sedimentation of streams. Simple logic as well as empirical research indicates that the net effect of high-intensity wildfires is to increase the sensitivity of sites to further soil disturbance.^{xxi}

The adverse effects of high-severity fires--decreased infiltration, increased overland flow, and excess sedimentation in streams--are all exacerbated by salvage logging.^{xxii} This occurs directly through disturbing soils and indirectly

through removing large-diameter trees. Not only does coarse woody debris help intercept precipitation and retard erosion, but large-diameter logs also help retain vast amounts of water, releasing it slowly into soil and streams over time.^{xxxii} When logs fall across streams, they trap sediment and form backwater areas and "stair-step" stream profiles that dissipate the energy of flowing water even on high gradient slopes.^{xxxiv} These check-dams and backwater pools help maintain clean water and create vital resting, feeding, and spawning habitat for aquatic species such as salmon.

Additionally, the interior of large-diameter logs are capable of storing vast amounts of water which provide long-lasting, high-moisture microsites that aid forest recovery during drought periods or fires.^{xxxv} In a study of downed logs on a dry forest site that had no precipitation for 77 days prior to a high-intensity wildfire, scientists discovered tremendous quantities of water stored in the interior of the logs--so much, in fact, that the researchers could literally wring the water out of the wood.^{xxxvi} Another study in the Cascades discovered that decayed logs averaged 350% moisture content in the winter, and 250% in the summer.^{xxxvii} This water in downed wood aids the establishment of pioneering plants following fire, and maintains adjacent vegetation during drought periods when soil moisture would otherwise be low. Removing large snags and logs by salvage logging eliminates these water reservoirs in streams and soil, and causes degradation of water quality, aquatic habitats and watersheds.

SALVAGE LOGGING CAUSES SIGNIFICANT EFFECTS ON FOREST VEGETATION

Salvage logging decreases natural plant regeneration, both by mechanical damage from felling and dragging large logs across the ground surface, and by changing the microclimate through removing protective shade.^{xxxviii} The primary effects of removing shade-producing large snags and logs are increased solar radiation causing higher temperatures and lower relative humidities during daytime, increased heat loss during night, and more extreme temperature fluctuations overall.^{xxxix} Soils and vegetation are also more exposed to the drying effects of increased surface winds.

Even though high-intensity fire may consume tree crowns, the residual shade provided by large-diameter snags and logs is significant, and is vital for retaining soil moisture for vulnerable tree seedlings, and moderating temperature increases in streams for sensitive fish species.^{xxx} For example, on a hypothetical south-facing 50% gradient slope located at 45 degrees latitude, 100 trees averaging 150 feet tall and 24 inches wide would provide 6,900 square feet of shade, or 14% of the slope surface during the course of a day.^{xxxi} In an empirical study of headwaters burned by high-intensity wildfire during the 1987 Silver Fire, researchers discovered that dead trees provided 57% of the shade for streams; this was three times more shade than derived by the surrounding topography, and twice as much shade as produced by the remaining live vegetation.^{xxxii} In addition to aiding survival of vegetation and fish, the microclimatic effects of shade-producing snags and logs also help mitigate fire hazard.^{xxxiii} These ecological benefits of fire-killed snags and logs on moderating the microclimate are sacrificed by salvage timber extraction.

SALVAGE LOGGING CAUSES SIGNIFICANT EFFECTS ON WILDLIFE

Although fires can cause mortality of individual animals, in general, wildlife populations respond positively to fires and in fact are attracted to burns for the vibrant flush of nutrients and new vegetation, and the pulse of new snags and logs, that result from fires.^{xxxiv} Cavity-nesting species are prime beneficiaries of fires, and 62 species of birds and mammals use snags, broken-topped, diseased or otherwise "defective" trees for roosting, denning, foraging, or other life functions.^{xxxv} In the Douglas-fir region of western Oregon, approximately 20% (34 species) of all bird species depend on snags for nesting for foraging.^{xxxvi} In bird studies conducted in the Foothills and Star Gulch Fires, 87 bird species were recorded in the burns, 43 species built nests, and 67% of those species were neotropical migrants.^{xxxvii} In another field study, 96% of all dead trees within monitoring plots showed evidence of foraging by woodpeckers within one year after the fire.^{xxxviii} Woodpeckers are an especially important species, for they excavate cavities essential for non-excavating species such as bats and squirrels; however, recent studies indicate that current management guidelines for maintaining snag density may be too low to provide for desired population levels of woodpeckers because the guidelines only focus on their nesting requirements.^{xxxix}

Larger-diameter trees (e.g. greater than 20 inches DBH) are not only more utilized by cavity-nesting wildlife, but they also stand longer and have greater longevity as downed logs than smaller-diameter trees.^{xl} Large-diameter trees enable bigger cavities for larger-sized animals, and the deep furrows of their bark provide greater food supply of insects.^{xli} However, salvage logging primarily targets larger-diameter trees because these comprise the most commercial value for logging companies. In addition to snags, large-diameter logs are utilized for feeding, shelter,

and reproduction by a number of mammals, reptiles, amphibians, and insects.^{xliii} The density and distribution of snags and logs in Douglas-fir forest ecosystems greatly influences the density and distribution of snag/log-dependent wildlife.^{xliiii} Empirical studies have found that the range of snag diameters, and average length and frequency of downed logs in streams was greatest in unmanaged old-growth stands compared to salvage-logged areas.^{xliiv} In fact, forest managers are finding it difficult to meet the number, density, size, and condition of snags required by their Forest Plans due to past salvage logging and old-growth clearcutting that removed snags.^{xliiv} Far from being a "wasted resource," large-diameter snags and logs play critical structural and functional roles in maintaining healthy, diverse wildlife populations.^{xlivi} Indeed, an ecologist could argue that a dead tree sustains more wildlife than a live tree.

SALVAGE LOGGING CAN INCREASE FIRE RISKS AND FUEL HAZARDS

Salvage logging proponents may acknowledge the essential ecological roles and values that snags and logs provide for soils, streams, vegetation, and wildlife, but these values are too often eagerly traded away for alleged reductions in fire risks and fuel hazards. However, as previously noted, there are no scientific studies demonstrating that large-diameter fire-killed snags pose an increased risk of high-intensity reburns, or that salvage logging effectively reduces fire risk.^{xlvii} On the contrary, there is growing scientific evidence that large-diameter snags and logs have naturally low flammability while post-fire salvage logging itself may actually increase the rate of spread, intensity, and severity of fires.

First of all, from the standpoint of the physics of combustion, it is the fine fuels such as grass, needles, and small limbs that carry fire, not large dead woody material.^{xlviii} Large-diameter fuels have naturally low flammability because they have a low surface-area-to-volume ratio (SAVR) that limits the amount of oxygen available for combustion. Conversely, smaller fuel particles have higher SAVR values which fuel higher rates of spread and fireline intensity. Consequently, only dead fuels less than three inches in diameter and live fuels less than 1/4 inch in diameter are used in fire spread models because it is these fine fuels that propagate fire; large-diameter fuels (greater than three inches in diameter) are not included in the calculations for fire spread at all.^{xlix} Furthermore, large diameter fuels retain moisture longer and later into the season, further reducing their flammability particularly when wildfire potential is at its greatest.ⁱ

Large standing tree boles, dead or alive, are typically unavailable for combustion especially when fires have removed underlying ground vegetation and downed fuels.ⁱⁱ While dead trees may be more flammable for 2-3 years after a fire while their dead needles are retained, after their needles drop to the ground, crown fire hazard essentially drops to zero, and the standing tree boles do not readily ignite.ⁱⁱⁱ Most larger tree boles are not consumed by fire even if killed, and then they often remain standing for decades, providing biological legacy and ecological values essential for natural post-fire recovery processes.ⁱⁱⁱⁱ When snags fall to the ground then their relative flammability increases, but it may take as long as 20 years for a pulse of burned ponderosa pine trees 6-9 inches DBH to fall, and recent research suggests that larger ponderosa pine trees can remain standing up to 80 years.^{lv} Large-diameter downed logs in isolation do not burn well, if at all, unless they are very dry and placed in close proximity to each other (approximately a diameter apart).^{lv} On the other hand, well decayed logs can burn easily via glowing combustion, but this does not cause extreme fire behavior. Decayed logs can smolder for long periods of time, causing high severity, but these effects are localized to underlying and adjacent soil.^{lvi} Snags and logs can emit burning embers that if lofted by wind can cause spotfires, but these embers can only ignite in fine fuels, not other large snags or logs. The low flammability of large-diameter downed logs is further mitigated by their interior water content which increases with the length of time they are on the forest floor and their subsequent stage of decay.^{lvii}

Salvage logging typically removes the larger diameter trees that have the most commercial value but least flammability, but leaves behind the smaller diameter trees and logging slash that have little to no commercial value but are the most flammable fuels. In calculating the fire hazard of slash-laden salvage logging units, they are assigned fuel model 12, one of the highest ratings for rapid fire spread and fireline intensity.^{lviii} Indeed, in a study modeling the effects of various fuels treatments in the Sierra Nevada, lop-and-scatter, group selection (small clearcuts), and salvage logging operations that left the slash and adjacent landscape untreated produced the highest fireline intensity, heat per unit area, rate of spread, area burned, and scorch height of all other fuels method treatments because they increased the flammable surface fuel load.^{lix} The researcher concluded that salvage logging would make the fire situation more severe because removing only large, standing trees will not reduce fire hazard in

Sierra Nevada forest ecosystems.^{lx} The same principles of fire physics contrasting the flammability of large-diameter logs versus small-diameter salvage logging slash applies to other ecosystems and regions, as well.

SALVAGE LOGGING IS ABOUT SHORT-TERM TIMBER INDUSTRY PROFITS, NOT LONG-TERM FOREST ECOSYSTEM HEALTH OR PROTECTION

The net effect of post-fire salvage logging large-diameter standing dead trees is to immediately create an extremely high fuel hazard when the commercial values are high but the fire hazard is naturally be very low, while ignoring accumulated fine fuels several years after a fire when the fire hazard is elevated but the commercial values are nil. Salvage sales usually address financial goals rather than ecological needs, even though they are often promoted as a means of reducing future fire, insect, or disease outbreaks.^{lxi} The typical urgency behind salvage sales--often utilizing so-called "emergency" declarations to avoid potential administrative appeals--is not based on reducing short-term fire hazard, but on capturing the most amount of commodity timber value along with an alleged reduction of long-term fire hazard.^{lxii} In so doing, ecosystem recovery and hazard reduction objectives are normally compromised. According to the best available science, "There is no ecological need for immediate intervention on the post-fire landscape."^{lxiii}

But the Forest Service offering salvage timber sales is one thing, getting willing buyers is another thing. When bids for the timber are not received, as has been happening increasingly in recent years amidst market forces that have produced a "timber glut," agencies may change the sale terms in order to attract bidders. For example, when a salvage sale on the Boise National Forest received no bids, the agency reduced the minimum bid price by 80%, from \$1.8 million to \$330,000, and when the Wenatchee National Forest received no bids for a 22.4 million board foot salvage sale, the agency increased the minimum size of the trees to be logged, and reduced the purchaser's deposit for brush removal from \$8.44 to \$0.16 per hundred cubic feet of brush.^{lxiv} The net effects of reoffered salvage sales are to increase the costs to taxpayers through additional planning expenses and reduced bid revenues, and to increase the extraction of larger, more fire-resistant and ecologically valuable trees. Indeed, post-fire salvage sales are costly to the U.S. Treasury, because they often cost more than the revenues they generate.^{lxv}

As has been demonstrated in discussion of the many ecological functions and values of fire-created snags and logs, the bottom line of post-fire salvage logging is an economic bottom line, not an ecological one. Indeed, the term "salvage" is perhaps solely appropriate for logging operations in which the primary objective is extraction of commodity timber values, not forest ecosystem recovery, restoration, or protection. The more scientists learn about the ecological values of large fire-killed trees, the more clear it becomes that by "salvaging" dead trees the agencies are scuttling forest ecosystems.

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lxv Gorte, 1995: 2

Liz Bueffel

From: Nancy Breuner
Sent: Wednesday, March 07, 2007 4:52 PM
To: Liz Bueffel
Subject: FW: Wenaha plan update

From: ODFW Comments
Sent: Wednesday, February 14, 2007 1:27 PM
To: Nancy Breuner
Subject: FW: Wenaha plan update

From: Deschaller@aol.com [mailto:Deschaller@aol.com]
Sent: Wednesday, February 14, 2007 11:28 AM
To: ODFW Comments
Subject: Wenaha plan update

Before the decline in the Wenaha elk population, I hunted in the Wenaha Wildlife area extensively. During the early years of my involvement in that area, I had very good success. The last time I was in the area I was turkey hunting and frankly that area is becoming overgrown. The forage for the deer and elk is being reduced by the brush that is growing. Frankly I believe that you need to run some cattle in the wildlife area for a couple of months each Spring to beat down some of the brush. I am speaking particularly about the wooded area next to Hayfer Ranch. One of these days I would hope that the elk population would recover in that area and the Wildlife area would once again become a productive area for hunting. Don Schaller, 1625 NW 130th Ave, Portland, Or 97229.

WHAT DO YOU THINK ABOUT WILDLIFE AREA MANAGEMENT?



The Oregon Department of Fish and Wildlife is seeking your comments regarding management of Wenaha Wildlife Area. You can add your comments to the record by completing this form and turning it in tonight, faxing it to ODFW at 503-947-6009, or by sending an e-mail to ODFW.comments@state.or.us. All comments will be summarized and posted to the ODFW Web site.

#1 - Winter feeding is adequate.

#2 - Exchanging of juvenile deer & Elk with other areas to lessen poor effects of inbreeding should be resumed.

#3 - More attention should be given to the control of the bear and the mountain lion populations.

#4 - Transplanting of juvenile trout into the Grande Ronde River should be resumed.

#5 - More credence should be given to those educated in wildlife management and less to the politicians.

Respectfully,

Raymond L. Brown Jr.

WENAHA WILDLIFE AREA MANAGEMENT

PUBLIC COMMENTS

FROM: Dick and Shirley Hone

Feeding the elk off the main road was a great idea.

We feel the following would greatly benefit the wildlife in the Wenaha Area:

1. Reduce the number of predators, especially cougars. We realize your hands are somewhat tied as far as doing this.
2. Now that the grey wolf has been removed from the endangered species list, do what is necessary to remove them from this area. Our dwindling deer, elk and sheep herds do not need another predator.
3. Tree farm the forested areas, by logging bug infested and dying trees, thinning, and reseeded grass where the land is disturbed. This would produce money for other projects and enhance the wildlife habitat. It would also help to keep the bug infestations from spreading.
4. Farm the old fields which are being taken over by noxious weeds. This would greatly improve grazing and/or produce hay for winter feeding.
5. Quit harassing the elk. You know by now that predators, especially cougars are the main cause of the dwindling elk herds. It is hard to understand how chasing elk with helicopters, netting, darting, separating mothers and babies and sometimes injuring or killing animals is any longer serving a real purpose. The money spent on this study could certain be better used to help these animals in a more humane way.

**WALLOWA COUNTY
BOARD of COMMISSIONERS
State of Oregon**

101 S. River Street
Room #202
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e-mail: wcboc@co.wallowa.or.us

**CHAIRMAN, MIKE HAYWARD
COMMISSIONER, DAN R. DEBOIE
COMMISSIONER, BENJAMIN M. BOSWELL**

February 6, 2007

Eddie Miguez
Wildlife Area Manager
Wenaha Wildlife Area
Troy, OR

Re: Comments on Wenaha Wildlife Area Plan Update

Dear Mr. Miguez,

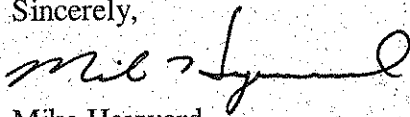
The Wallowa County Board of Commissioners would like to make the following comments concerning the Wenaha Wildlife Area Plan update. First of all we are very pleased with the emphasis in the plan on noxious weed control. As you are aware this is a very important issue in Wallowa County and your collaborative approach is certainly the most effective way to address this issue. Additionally we concur with your support for active management of the Wildlife Area. Seasonal cattle grazing to improve plant vitality and active forest management to maintain or improve forest stand health are critical components of the plan.

We understand the issue of inadequate funding to accomplish all of the work that is needed in the Wildlife Area. Perhaps a collaborative approach, involving the Wallowa County Natural Resource Advisory Committee (NRAC) and Wallowa Resources could bring needed funding to more quickly facilitate forest stand treatments. I have asked Bruce Dunn, Chairman of the NRAC, to explore this possibility.

Wallowa County recognizes the importance of the Wenaha Wildlife Area, supports the agency's goals, objectives and strategies, and is committed to working with the Oregon Department of Fish and Wildlife to maximize the benefits of this area to the wildlife and people of Wallowa County.

Thank you for the opportunity to comment.

Sincerely,



Mike Hayward
Chairman, Wallowa County Board of Commissioners