



TO: The Columbia River Gorge Commission, AND the US Forest Service.

FROM: Dave Thies, President
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COPIES: Interested parties.

RE: The Forest Service Plan for the Burdoin Mountain Special Management Area forests, and the Synergy Resources LLC timber cut in the East Fork of Major Creek Canyon.

Kind People,

When I last wrote you, I did not realize the Forest Service has a Plan to clear cut all the Douglas fir in the Burdoin Mountain Special Management Area. There are extensive forests consisting of about 99% Douglas fir within the walls of Major Creek and Catherine Creek Canyons. The Forest Service admits this ratio, but they soft-pedal it: "Although the predominant species of tree is Douglas fir, there are scattered ponderosa pines and fewer grand firs." (CRGNSA Consistency Determination, Synergy Forest Practice, p.7.) Within those stands are many mature trees (100-200 years old) and a lot of old growth trees. They will all be cut.

The pretext for this massive clear cutting is to "restore" the "Pre-European settlement" forest by removing the Douglas fir and replacing it with Ponderosa pine seedlings. This would occur over a period of time and the public would be reassured that the "larger" Douglas firs would be retained. It would seem like a series of forest thinning operations, until, in about 100 years in the case of the Synergy cut in the East Fork of Major Creek Canyon, the last of the mature and old growth Douglas firs would fall. Of course, once things get rolling, the cutting could occur at a faster pace.

The premise supporting this SMA clear cutting of Douglas fir is based on a claim that the original forests were predominately Ponderosa pine. (CRGNAS Consistency Determination, Synergy Forest Practice, p.7.) Has the Forest Service offered any substantial evidence of this? I would appreciate the Forest Service sharing their evidence, but they are requiring a Freedom of Information Act submission on our requests for information. The Forest Service has not complied with the few specific FOIA requests we have made in the past, and we have waited for well over a year.

On their return trip, while traveling east up the Columbia River, Lewis and Clark recorded in their Journal, "the Mountains through which the river passes nearly to Cataract River, (the Klickitat River) are high broken rocky, particularly Covered with fir and white Cedar, and in many places very romantic scenes." (The Journals of the Lewis and Clark Expedition, March 23-June 9, 1806, a Project of the Center for Great Plains Studies, University of Nebraska-Lincoln, Gary E. Moulton, Editor.) Major Creek and Catherine Creek Canyons are well to the west of the Klickitat River. Pine is also noted: "I observe near the river (the Columbia River) the long leafed Pine which increas as we assend and Superseed the fir altogether about the Sepulchre rock (Lower Memaloose Island)." (p. 120) This island is just east of Major Creek and Catherine Creek Canyons.

Without even mentioning the inner canyons, this Journal notation tells us something very pertinent to the question of what kind of forest Catherine Creek and Major Creek Canyons had in 1806. If the fir extended as far east as Lower Memaloose Island on harsh south facing slopes as Lewis and Clark recorded, it is likely, even almost certain, that Douglas fir predominated to the west in the partially shaded and moister canyons that are now "protected" by the Burdoin Mountain SMA. Furthermore, the Douglas fir forests in the Klickitat River Canyon provided additional evidence that canyons provide habitat for fir even farther east than Memaloose Island.

As pointed out in my previous letter, the old growth trees remaining in the East Fork of Major Creek Canyon tell their own story, just by being there. The remaining old growth Douglas fir trees outnumber the old growth pine trees by 99% to less than 1%. If the Pre-European tree cover had been Ponderosa pine, you would think there would be a lot more large surviving Ponderosa pines and a lot less fir. After all, fir has always been more marketable than pine.

The Forest Stewardship Plan for the Synergy cut tells us in the General Property Description, "The area was mostly logged (clear cut) about 40-50 years ago (1970-80's.)" (Page 2). This suggests there are very few trees older than 80 years, which is simply not true. This fact is mostly obscured in the documents named here. There are a lot of "mature" and old growth Douglas fir trees in the East Fork of Major Creek Canyon. (By mature trees I mean adolescent trees between 100 and 200 years old. Douglas firs have a life span of about 800 years.) Neither the Forest Consistency Determination nor the Stewardship Plan mentions the phrase "old growth Douglas fir," but rather refer to "larger trees" and "original trees." Neither does the Forest Service mention a specific size of Douglas that should not be cut, but they are very exact about the size of snags to be left. Snags are unmarketable trees. The Forest Service has an exact scientific definition of an

old growth tree, but using that definition would have clarified the full impact of their "restoration" Plan. Instead, the Forest Service muddied the waters by using general terms to describe the size and age of the older Douglas firs.

The Forest Service has already had an embarrassing episode on the White Salmon Wild and Scenic River. They refused to accept that a 40 acre parcel of remnant old growth timber was in fact old growth (the last on the river), and were going to allow it to be clear cut. CGAS members opposed that cut and hired Chris Maser (who wrote the old growth definition for the Forest Service), to assess the forest, and he reported that it definitely was an old growth forest. The Forest Service is more careful now in how they present their intentions. In the Burdoin Mountain SMA they presented their Plan as a "restoration" to "original" old growth Ponderosa pine forests. A bold Plan, and it sounds good, until the flaws and consequences of the Plan are exposed.

Are the Forest Service and Synergy really trying to create a supposed Pre-European forest of predominantly Ponderosa pine while retaining large firs within the Synergy cut boundaries? The Stewardship Plan Management Timetable (p. 8) reveals opposing intentions. During the first three years after the cut, they intend to plant pine and/or fir. Yes, that's right, this Plan allows Synergy the option to just plant fir, the most marketable tree. This after-cut re-planting option strongly suggests, along with the continued thinning of Douglas fir (2040-2050, 2070-2080) until, in 2100-2110, the remaining forest of original Douglas fir now standing on the Synergy property will be COMPLETELY REMOVED. After each "thinning" it is most likely that the owner will replant the most marketable tree: Douglas fir. The Timetable reveals that any retention of the large and old growth Douglas firs will be for the purpose of providing shade for young fir trees, and to reassure today's citizens that all is well. This Plan obviously will not produce a future diverse old growth forest, nor will it produce an old growth Ponderosa pine forest. What it will produce is a commercial Douglas fir tree farm that will likely be managed for rapid turnover, just like other commercial tree farms outside of this SMA. So, an original mature and old growth fir forest, along with 80 year old trees, is to be felled so fir seedlings can be grown? I ask you, what is so "Special" about that?

The Stewardship Plan for the Synergy cut allows a lot of flexibility as to what will be cut. The plan fails to direct "created openings" away from the larger older firs and requires that these openings retain between 0% and 40% canopy cover. (Why not just say 0% canopy cover is acceptable?) The Plan fails to direct high lead clear cuts away from the larger older firs. This lack of direction suggests that there are too many bigger older trees to easily avoid, and it allows the openings to occur among areas with the larger trees. Just the places Synergy would want to cut "natural openings" in.

The Stewardship Plan for the Synergy cut claims, "Bark beetles are the biggest risk to forest health on these properties." (It needs to be said: The biggest threat to forest health is misguided logging.) The insect "problem" is a common excuse used by the forest industry to cut older trees. When reviewing the property I saw a few very small clumps of dying trees, consisting of a few trees in each clump. Later in the documents the dead trees are noted as being caused by root rot due to moisture. How many trees will be cut

to stamp out this "biggest risk to forest health?" When a serious problem is declared over a minor issue, the answer is likely that a lot of trees will be cut to "protect forest health." This argument is bolstered by the follow-up statement that, "Removal of infected trees should be done as soon as it is feasible to help control the population of beetles and to recover the value of trees that are dying." (Both quotes from the bottom of page 2 of the Stewardship Plan.)

The Stewardship Plan even attacks the 200' riparian buffer zone for East Major creek, claiming that it "... needs thinning..." (Stewardship Plan, General Property Description, p.2)

The CRGNSA Consistency Determination, finds, "The project area is not within winter range for deer and elk." (P. 18, mid-page.) Not true. The bottom of Major Creek has a low enough elevation to provide winter deer range for deer and elk, and deer are regularly seen there, and elk are occasionally seen there. The Burdoin Mountain SMA canyons also provide migration routes for wildlife.

The Synergy Stewardship Plan claims that erosion hazard is Moderate. (P. 3, Resources.) They say, "The terrain on the west side of the creek is fairly steep while the east side is less so." (P. 2, middle paragraph.) This is disingenuous. The slopes of both sides of the canyons are very steep, as the Synergy provided contour map clearly shows, and the erosion hazard is actually High.

The Synergy Stewardship plan for this property raises serious questions. Will this company own the property after this proposed cut, or will they cut and run as commonly happens? If they cut and run, the new owner may propose his own Plan, or perhaps a new owner would be satisfied with the present plan, as it allows for re-planting the more marketable Douglas firs. Synergy is a family owned company, and the family owns other companies that may have an interest in conversion. Despite disclaimers, it is possible, perhaps even likely, that they intend to convert the top, level eastern part of their property for other uses like alternative energy. It may be significant that this property straddles the BPA power lines. The worthiness of the Synergy Stewardship Plan is minimal, but the impact of this cut would be large. It would signal other forestland owners throughout the SMA that the Forest Service would allow phased clear cutting of their fir forests, and the conversion of those natural forests into tree farms, or possibly for other less natural conversions.

Has the Forest Service responded to the request I made in my last letter? Will they agree to do a walk through with Chris Maser, Norm Johnson or Jerry Franklin (the best forest experts in the NW)? The Forest Service might accommodate the Gorge Commission if members express an interest. It would be a kind consideration to invite me on such a walk, since I'm the one to suggest it.

Has the Forest Service agreed to public transparency about their Plan to remove Douglas fir forest in this SMA? The Plan is so drastic that it deserves public exposure. The Forest Service should confirm or deny that about 250 log truck loads of timber is

expected to leave the 65 acre Synergy cut, as The Columbia Gorge News reported. The public deserves to know the number of loaded log trucks that have already left this SMA, and how many more are planned. The real impact of "restoring" a supposed Pre-European settlement forest begs public airing and the public's response.

I predict the Forest Service will do nothing about the issues raised in this letter, unless Gorge Commissioners start asking questions and asks for real Forest Service transparency. I cannot do this. I can only alert you to the problem. Because of the public nature of the Gorge Commission you are in a position to influence the Forest Service. The Gorge Commission should publicly request a question and answer session on the Forest Service Plan for SMA Douglas fir trees. I believe the Forest Service is very aware that that their Plan would be a great embarrassment if the truth of it were to become public knowledge. I am urging members of this commission to use your influence to encourage the Forest Service to place a moratorium on the Synergy cut in the East Fork of Major Creek Canyon within the Burdoin Mountain SMA. (Cutting could start as early as July 15th.) I also urge members of the commission to ask the Forest Service to reconsider their plan to remove entire SMA Douglas fir forests and starting over with seedling Ponderosa pine, or even Douglas fir, for that matter. If the Forest Service is allowed to proceed with their Plan, great SMA Douglas fir forests will be gutted. Now that you know this, the question is, will you try to stop the implementation of this disastrous plan, or will you stand by and watch it happen?

The Forest Service may have made reassuring noises to you about their oversight of the proposed Synergy cut, and their management of this SMA. They may have made disparaging remarks about my message, and I cannot reply because I am not plugged into the Internet. What I do have is this: If it were not for my advocacy for the creation of the Burdoin Mountain Special Management Area it would not exist. What I do have is 45 years experience monitoring and commenting on proposed actions by local agencies, governments, developers, hydropower owners, alternative energy proponents and the timber industry. You might say that by now I am a savvy advocate for the best long-term interests of the public. There aren't enough of us. I am about 75 years old, and I have health issues. My sincere hope is that one or more of you will step forward on this SMA issue, because that is what it will take to save this Special Management Area, and frankly, a lot of other significant places in the Gorge that deserve to be preserved for the enjoyment of future generations. I can only offer people choosing to help make this a better world this reassurance: You will become a better person in ways you cannot imagine due to your efforts.

A handwritten signature in blue ink that reads "Dave Lier". The signature is fluid and cursive, with a long horizontal stroke extending to the right.