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**Scoping Comments on the Proposed
Flank Vegetation and Fuels Management Project EA**

Shane Jeffries, District Ranger,
Jim Lowrie,
Christy McDevitt,
Deschutes National Forest,
Bend-Fort Rock Ranger District,

The Oregon Chapter Sierra Club and the League Of Wilderness Defenders – Blue Mountains Biodiversity Project are jointly filing the following these comments concerning the proposed Flank Vegetation and Fuels Management Project EA. The Flank Project directly and significantly affects the members and volunteers of both the Oregon Chapter Sierra Club and the League of Wilderness Defenders – Blue Mountains Biodiversity Project.

The Sierra Club represents over 20,000 members throughout Oregon, including the Club's Juniper Group, which has over 1,200 members throughout central and eastern Oregon. Nationally the Sierra Club represents well-over one million members. Sierra Club members feel strongly about nature, wilderness, natural forest ecosystems, wildlife, fisheries, and the environment. Sierra Club members regularly enjoy hiking, camping, wildlife watching, birding, ecological study, and photography within the public lands forests of central and eastern Oregon, including the Deschutes NF project area and surrounding forests and waterways.

LOWD-Blue Mountains Biodiversity Project has many members and volunteers throughout the Northwest. Members and volunteers of the LOWD-Blue Mountains Biodiversity Project regularly use the Deschutes NF, including the project area, for hiking, ecological study, watching wildlife, viewing forest native botanical diversity, and avian species study.

Development and implementation of the Flank Project as proposed could adversely affect the members of both of our organizations because the proposed logging and related project activities may result in degradation of the ecological integrity and wildlife habitat in and around the analysis area. Both of our organizations have a long-standing and well-documented interest in the management of the area in which the Flank Project is located.

Project Location:

The project is located 17 miles southeast of Bend, two miles south of Horse Ridge, and just south of FS Road 18 (China Hat Road); covering T20S, R13E, Sections 12, 13, 14, 15, 22, 23, 24,25, 26, 27, 34, 35, and 36; and T20S, R14E, Sections 19, 29, 30, 31 and 32; in the Lower

Dry River and Upper Dry River 5th filed watersheds, and the 6th field watersheds for Hunter, Horse Ridge, and Teepee Draw; in Deschutes County, Oregon.

Description of project area:

- Recent fire history including the Skeleton, Evans West, and Paulina Fires (dates not disclosed);
- Clear cut logged in the 1920's, and 1930's, and logged again in the 1970's;
- Stands are dominated by 80 year old black bark ponderosa pines, with some scattered remnant mature and old characteristic pines;
- existent mature and old trees are both rare and of significant ecological importance for forest structure, long-term resilience, and wildlife habitat;

LRMP Designations:

- **General Forest Management (MA8);**
- **Deer Habitat (MA7);**

Proposed Action:

- 5,600 acres of commercial logging and small tree thinning;
- Overstory and salvage commercial logging removal of mistletoe trees, and to purportedly reduce the risk of bark beetle impacts;
- Unspecified miles of road maintenance and reconstruction;
- Unspecified extent of fuels treatments including mowing, burning, pile burning, and utilization;

Purpose and Need:

- "Improve resiliency to large scale disturbance events such as insect, disease, and wildfire by reducing forest vegetation density;
- "Move watersheds towards historic conditions by addressing tree species composition and reducing stocking levels in dense stands dominated by ponderosa pine;

NEPA Analysis:

- Proposed NEPA EA Analysis;

Recommendations and Concerns

- The project appears to involve similar management actions and objectives as the relatively nearby Lava Cast Project, which has resulted in considerable environmental harms and NEPA decision violations;
- The Project involves extensive significant management actions and impacts including irretrievable logging impacts across 5,600 acres of public forest lands, necessitating an EIS instead of an EA for this proposed project;
- The proposed logging will have significant cumulative impacts in conjunction with widespread logging-thinning actions across the bend Fort Rock District, necessitating EIS analysis, including the Lava Cast, East Tumbull, Sunriver, South Bend, Lava Cast, Hwy 97 widening; Oz, West Tumbull, Deadlog, Opine, and Snow Fuels Projects, and including extensive ORV trail systems and recreational use throughout the area;
- The agency has failed to disclose and assess the actual impacts, purpose and need accomplishments and effectiveness, monitoring results on issues of concern, and recreational impacts of its related logging, thinning, mowing, and burning actions across the District. The EIS for this project must disclose and assess actual impacts, and include

provisions to effectively prevent the harms of similarly premised projects including Lava Cast, Oz, East Tumbull and others;

- The Deschutes Forest Plan and its management direction for the area is seriously outdated; fails to incorporate significant new scientific research; and fails to address significantly changed conditions as a result of extensive logging thinning, fires, and ORV use throughout the greater Deschutes National Forest area;
- There exists an excellent analysis opportunity to assess the actual impacts on forest ecology, structure, wildlife habitat and populations, recreation, and community interests; and whether similar projects including Lava Cast and Oz met or failed to meet their purpose and need objectives. Before similar impacts are repeated across the landscape, the proposed actions and cumulative impacts of adjacent area projects must be disclosed and assessed in a NEPA EIS analysis process for the proposed Flank Project;
- NEPA mandates new scientific research studies and recommendations be incorporated into proposed project actions. The notice evidences no disclosures or acknowledgement of considerable scientific research that calls into serious question the efficacy and ecological need for the proposed logging actions, nor any evidence of the incorporation of significant new research addressing the importance of carbon sequestration in forest ecosystems in helping to counter exponentially growing climate change; Among the new research reports that need to be addressed are issues of:
 - Carbon sequestration, climate change, and the critically important role forests play in helping counter exponentially increasing climate change, emphasizing in particular the essential roles performed by forest soils, soil communities, and trees above 10” to 14” in diameter. The project’s proposals to remove “commercial” sized trees between 12” up to 21” dbh and overstory trees are in contravention to the recommendations of scientific research concerning climate change and carbon sequestration;
 - The project’s proposal to remove trees between 12” up to 21” dbh are in contravention to the recommendations of scientific research regarding effectively achieving fire risk reduction objectives, with research evidencing that such excessive logging-thinning actually increases fire risk, and reduces the resilience of forests to natural disturbance;
 - The project’s proposal to remove trees between 12” up to 21” dbh are in contravention to the recommendations of scientific research regarding providing for the wildlife habitat needs of the area’s many species of the concern and management indicator species. Many cavity excavator species, such as white-headed woodpeckers, use and/or prefer natural ponderosa pine forests. Studies of white-headed woodpeckers found that they utilized snags from 9” to 39” dbh, with a mean average diameter of 18” when sufficient snags of this size were available (Matthews, 1990) (Milne, ’89, in a similar study found the range to be 8.3” to 74.8”); when large trees and snags are largely absent, the mean average range decreases significantly towards the lower end of the use range. Similarly such logging adversely impacts species such as Goshawk, disclosed as being in the project area;
 - Despite the notice acknowledgement that large old trees are almost completely absent in the project area, and the consequent ecological importance of the area’s maturing trees above 14” in diameter, the Flank Project would log trees up to 21”

dbh, further setting back the ongoing natural ecological recovery of the area's forest structure and wildlife habitat;

- The EIS must disclose the percentage of trees of particular diameter classes present in the area, and whether trees above 14", 16", and 18" in diameter respectively make up a significant portion of the area's forest stands considered to be in excess of desired Stand Density Index levels, or whether these size categories are lacking in part or all of the project area. Eastside Screens may allow for the removal of trees up to 21" dbh, however, they do not require such removal. The scientific foundation of the Screens emphasized that snags above 15" dbh are considered ecologically important as forest structure and cavity nester habitat. In deciding what diameter limit is appropriate to a specific project area, the agency must employ a reasoned assessment of the presence, abundance, importance, and role trees of a particular size class perform in the project area units before concluding what diameter limit is appropriate to meeting ecological objectives. Agency logging actions must be based upon sound science employing ecologically sound 14" and 16" variable diameter limits, and not arbitrarily contrived 21" dbh limits;
- Plans to pile and burn slash are in contravention to the scientific research conclusions regarding the severe soil community damage such burning causes, which can require decades to a century to recover, and which impairs the resilience and biodiversity of the forest ecosystem;
- Plans to utilize soil damaging ground based logging methods fail to incorporate or address the conclusions of scientific research regarding the long-term harms of such logging methods, and fail to incorporate recommendations for strategically limited light on the land machinery and impacts to protect soil communities, forest hydrological functioning, and long term forest resilience.

The members and volunteers of our organizations, and quite a number of Bend area residents and recreational visitors, have expressed serious concerns, alarm, and disagreement with the excessive ecologically harmful, and visually and recreationally degrading impacts of the Lava Cast, Oz, Sunriver, and East Tumbull projects' logging and thinning actions. Logging and thinning actions have harmed removed essential wildlife cover, devastated natural scenic qualities, and intruded and harmed forest stands across the District's forests. Piled slash and logs not removed for commercial purposes if burned as planned would further unacceptably harm area soils and natural qualities. Extending such egregiously excessive logging, thinning, burning, and mowing harms yet further across the District's forests is environmentally and legally unacceptable. The action as proposed would harm the interests of the members of volunteers of our two conservation organizations, as well as community recreationists, residents, and visitors. The actions and decision as proposed would violate the clear requirements and intent of the nation's environmental policy laws.

In conclusion, a legally compliant NEPA EIS analysis is needed for this project. We look forward to discussing this proposed project further with agency project leaders and decision-makers, and recommend a public field trip to the proposed project area. We herein reference our previous comments, appeals, objections, and their comprehensive science and legal exhibits which have been provided to the Deschutes National Forest decision-makers and planning staff,

and recommend these be reviewed for incorporation in the NEPA analysis process for this proposed project.

For our natural 'wild' forests,

A handwritten signature in black ink that reads "Asante Riverwind". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

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