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Shane Jeffries, District Ranger,  
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### **Comments on the Deschutes NF Sparky Danger Tree Removal Project**

The Oregon Chapter Sierra Club and the League Of Wilderness Defenders – Blue Mountains Biodiversity Project have reviewed the February 16, 2009 notice for the proposed Sparky Danger Tree Removal Project. The Sierra Club represents over 20,000 members throughout Oregon, including the Club's Juniper Group, which has over 1,000 members throughout eastern Oregon. 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 national forests of central and eastern Oregon, including the Deschutes NF project area. 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 National Forest, including the proposed Sparky project areas, for hiking, ecological study, watching wildlife, viewing forest native botanical diversity, and avian species study. Implementation of the proposed Sparky project as planned would directly affect the interests of the members and volunteers of both of our organizations.

While removing danger trees from public roadways is important, it is essential that the following be adhered to throughout the design, marking, and implementation of this project:

- Only trees that truly pose a danger of actually landing in public roadways should be felled. Trees leaning away from roads, located more than a tree length away, still alive, and/or located downslope from roadways and thus unlikely to reach the road; should all be left in place;
- Sufficient downed trees should be left onsite for wildlife habitat, soil replenishment, and slope stability;
- Trees in riparian areas should be left fallen on site;
- Care should be taken to ensure forest stands along roadways are left in a natural condition, and that roadways do not resemble unnaturally wide- 'freeway' -sized swaths cut through the forest;
- Only main thoroughfares should have danger tree felling. Little used spur roads should be closed rather than included in the project;
- The EA analysis is lacking in scientific analysis, cumulative impacts, and wildlife habitat disclosures and assessment to allow the proposed alternative 3 expansion of the danger tree premise into a widespread commercial logging project. Such action requires a much more

comprehensive analysis, with adequate public notice and comment, before a legally compliant and environmentally-sound decision could be reached for this proposed project expansion. Such felling is largely unwarranted, and likely to result in significant ecological harms. Lodgepole pine forest systems in the area are within their natural ecological process of growth, density, and insect mortality; upon which state sensitive and regionally listed species of concern depend for habitat and sustenance. The EA failed to adequately disclose and address scientific research pertaining to these regionally listed species of concern, failed to address cumulative project impacts, and failed to disclose scientific research pertinent to lodgepole pine forest stands and processes. As such the agency is legally precluded from approving alternative 3.

- Machinery and methods employed must be light on the land in impacts;
- Slash from the project must be removed within one year post-project to avoid increasing fire risks (especially in roadside areas from human caused fires), and to protect this recreationally important area's scenic qualities;
- Larger trees in the area should be prioritized for use as woody structure and habitat in needed restoration projects in the greater area, and to help provide barriers to harmful OHV and snowmobile incursions into the area's non-motorized wildlands;
- As possible, seasonal restrictions on felling should be implemented to avoid harm to nesting and fledging avian species and other species of concern;
- Care must be taken to prevent the introduction and spread of invasive exotic plants.

For the Our Natural Wildlands,

A handwritten signature in black ink that reads "Asante Riverwind". The signature is written in a cursive, flowing style and is positioned above a horizontal line.

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