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“EXF” Scoping Comments on the proposed Lookout Mountain Unit, Pringle Falls Experimental Forest Project

The Oregon Chapter Sierra Club and the League Of Wilderness Defenders – Blue Mountains Biodiversity Project have reviewed the scoping notice for the proposed “EXF PFEF” Project. The Sierra Club represents over 23,000 members throughout Oregon, including the Club’s Juniper Group, which has over 1,000 members throughout central and 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, photography, natural solitude, and recreation within the national forests of central and eastern Oregon, including the Pringle Falls Experimental Forest 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 PFEF project area, for hiking, ecological study, watching wildlife, viewing forest native botanical diversity, and avian species study. The EXF Project as proposed would directly and significantly affect the members and volunteers of both of our organizations.

As presented, the scoping notice’s proposed actions appear to significantly diverge from scientifically supportable ecologically appropriate methods to effectively reduce forest fuels, fire risks, and naturally inherent insect mortality in forest ecosystems. Consequently, development of the “EXF” Project as proposed appears to be in contravention to scientific recommendations, long-term ecological objectives, and native species habitat and viability requirements. The proposed actions need to be based upon credible ecologically non-controversial science research restoration recommendations; avoiding actions that could result in significant harms to natural forest ecology and biodiversity. Proposed actions appear to far exceed that scientifically necessary and capable of achieving fire risk reduction and ecological purpose and need goals. Removal of mature and old fire resistant trees, excessive thinning in mixed conifer forest habitat, and potential use of heavy machinery would adversely impact forest ecology; biodiversity; vegetation; soils; wildlife, avian, botanical & aquatic species of concern populations and habitat; riparian areas and waterways; resulting in further degradation of the ecological integrity, wildlife habitat, soil hydrology, and natural systems in and around the project area.

In brief, project provisions need to include:

- A. Providing for the retention of all trees with old and mature characteristics in ponderosa pine and mixed conifer forest areas;
- B. Protecting soils by requiring low impact light machinery in all interior forest areas where machinery is employed;
- C. Protecting riparian areas by prohibiting machinery use and commercial felling in these locations;
- D. Seasonal restrictions on project implementation protecting avian species during nesting and fledging periods;
- E. Other provisions as ecologically appropriate as noted below.

The notice proposes a series of varied thinning actions, relying on scientifically controversial and potentially inaccurate “Upper Management Zone” formulas. Proposed actions include apparent commercial logging-thinning of up to $\frac{3}{4}$ of UMZ PAG specifications – meaning that area forests could be excessively logged across all diameter categories – including removing inherently fire resistant mature and old growth trees - leaving only $\frac{1}{4}$ to $\frac{1}{2}$ of UMZ specified forest stands remaining. Translated, this means insufficient trees and forest stand structure would be left, harming wildlife and forest ecological integrity. Such actions would also increase and exacerbate the risk of severe fires, as fire resistant mature and old trees would soon be replaced with fire-prone brush and small diameter trees.

We strongly recommend against the actions as proposed. Limiting thinning to only smaller diameter trees, employing variable diameter thinning limits as appropriate to PAG site specific conditions, would be more scientifically and ecologically supportable. For example, limiting felling to trees <12” dbh, or a range of variable diameter limits from 14” to 18” at most, is less scientifically controversial and more ecologically capable of achieving project purpose and need goals.

We look forward to reviewing the draft EIS for this proposed project. The EIS should disclose:

- Old growth forest areas size and location;
- Listed species and species of concern in and adjacent to the project area;
- Soil conditions;
- Riparian areas and waterways, and affected aquatic species;
- Invasive exotic plant issues;
- Inventoried and uninventoried roadless areas in and adjacent to the project area;
- OHV issues in and adjacent to the project area;
- The full range of applicable scientific research pertinent to the proposed project, including that which may substantiate proposed actions and that which recommends against such actions or addresses issues of scientific controversy;
- Natural fire cycles, patterns, and conditions that historically occurred in this area and current fire and management history;
- Cumulative impacts for past, present, and future projects in and adjacent to the proposed project area;
- Other pertinent information as environmentally, scientifically, and legally appropriate.

The EIS should develop a full range of different scientifically and ecologically substantiated action alternatives. To help identify additional conservation concerns, we herein reference the substantial ecological, science, and legal concerns and issues noted in our comments (and/or appeals and litigation as applicable) on the Five Buttes, Kelsey, Snow Fuels, South Bend, W. Tumbull, Sunriver, Lava Cast, and other fuels reduction thinning styled projects.

We recommend a public open house and also a field trip to the proposed project area for the EXF project. We look forward to discussing these and additional conservation concerns with agency planning staff, ideally before this proposed project develops any further, as soon as possible. I can be reached at the contact info below.

For our natural wild heritage!,

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