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West Tumbull “Hazardous” Fuels Reduction Project Scoping Comments

The Oregon Chapter Sierra Club and the League Of Wilderness Defenders – Blue Mountains Biodiversity Project have reviewed the scoping notice for the proposed West Tumbull “Hazardous” Fuels Reduction HFRA 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, cross country skiing, photography, natural solitude, and recreation within the national forests of central and eastern Oregon, including the Deschutes National Forest’s proposed West Tumbull 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 West Tumbull project area, for hiking, ecological study, watching wildlife, viewing forest native botanical diversity, and avian species study. The West Tumbull HFRA Project as proposed directly and significantly affects the members and volunteers of both of our organizations.

The Forest Service scoping notice discloses:

Project purpose, size, and location: “to reduce hazardous fuels on approximately 1,302 acres along Forest Roads 4601 (Skyliners Road) and 4603 in the Tumalo Creek watershed starting approximately 10 miles west of the City of Bend to approximately ½ mile upstream of the confluence of Tumalo and Bridge Creeks.”

Project methods: “Hazardous fuels would be reduced using commercial and non-commercial thinning, mowing of understory vegetation, burning of understory vegetation, or a combination of these methods.”

Commercial logging volume: undisclosed/unknown.

Project byproducts and slash: “Activity slash generated by commercial and non-commercial harvest would be utilized for biomass, firewood, or other products or be piled and burned either within treatment units or on landings.”

Species of concern in the area: undisclosed.

Salmonid waterways/water quality condition/listing: undisclosed.

Invasive plant presence in area: undisclosed.

Project area: “National forest lands adjacent to private lands and developed facilities including but not limited to Skyliner Lodge, Tumalo/Skyliner recreation area which includes Tumalo Falls and numerous trails, and portions of the City of Bend water municipal watershed. Proposed treatment areas are located within the wildland-urban interface (WUI) boundaries described in the GBCWPP and EWDCWPP.”

** Management Designations:* “...entirely within the boundaries of the Northwest Forest Plan (NWFP). A portion of the planning area (approximately 2,338 acres) is within the boundaries of the Upper Tumalo Creek 6th field watershed. The NWFP identifies Upper Tumalo Creek as a Tier II key watershed and a source of high quality water.”... “The Deschutes National Forest Land and Resource Management Plan identifies six LRMP Land Allocations, West Tumbull Project Area:

General Forest MA-8 Timber Production 1,082 acres

Scenic Views MA-9 Visual Quality 949 acres

Bend Municipal Watershed MA-10 Water Quality 31 acres

Intensive Recreation MA-11 Quality Outdoor Recreation Opportunities 364 acres

Winter Recreation MA-13 Quality Winter Recreation Opportunities 153 acres

Front Country Seen/Unseen MA-18 Natural Appearing Forest Landscape 1,307 acres

Other Ownerships 703 acres

Total 4,589 acres

Northwest Forest Plan Management Allocations, West Tumbull Project Area:

Administratively Withdrawn Recreation and scenic 547 acres

Matrix Renewable Timber 2,530 acres

Riparian Reserve Riparian 807 acres

Other Ownership NA 703 acres

TOTAL 4,587 acres

(The notice fails to disclose the LRMP/NFP allocations within the proposed units, including the planned commercial logging units. Also, it is unclear why a two acres discrepancy exists between the two above totals.)*

Project “Purpose and Need: Improve protection to adjacent private lands, public and private structures and facilities, and infrastructure from wildfire events by increasing the number of acres in condition class 1 and decreasing the number of acres in condition class 3; and Provide safe egress of local residents and the safe ingress and egress of firefighters during wildfire events.”

Commercial logging units: Apparently “units 8, 9, 10, 12, 16, and 18” covering a combined 492 acres in both ponderosa pine and mixed conifer forests.

Opening of closed roads: 2.5 miles.

Road construction: .5 miles of so-called “temporary” road (*ecologically there is not such thing as a temporary road, as road beds continue to have detrimental impacts for more than a century).

Fire lines: 32,300 feet or over 6 miles of mechanical and hand fire lines.

The proposed project area is both an ecologically and recreationally treasured part of the Deschutes National Forest. Consequently, great care must be taken by the agency to ensure natural resource values are not harmed by this proposed project. Actions as proposed however, appear to warrant great conservation concern; from the blanket “trees per acre” logging formulas to the lack of disclosures regarding supporting science, old growth and species of concern; the proposed project from the onset fails to meet NEPA’s initiating requirements. Additionally, the area’s mixed conifer remaining mature and old forests are some of the best viable forest habitat in this area, due to the cumulative extent of past logging

and other management harms in the greater area. It is imperative that these areas be protected from the many known significant harms of commercial logging.

The scoping notice's proposed West Tumbull HFRA project actions appear at best to be based upon scientifically controversial assumptions, goals, and management methods. Whether the agency's proposed actions will effectively accomplish their "purpose and need" goals and objectives is likely to depend upon the degree in which these actions embody scientifically supportable ecologically appropriate methods to effectively address naturally occurring forest fuels, and fire risks inherent in forest ecosystems. As this project begins its HFRA collaborative process and NEPA analysis, it is important the agency fully involve and incorporate the concerns of local residents, recreationists, area employees, and interested public; and it is important the agency incorporate, disclose, and assess the full range of applicable scientific research.

NEPA requires that proposed management actions be supported with analysis disclosures of substantiating science and high quality expert advice. Accurate site-specific conditions, cumulative impacts analysis, and disclosures and assessments of the proposed project's impacts upon species of concern must be presented in the EA. The project must base its planned actions on credible scientific recommendations towards protecting, restoring and maintaining the long-term ecological integrity and functioning of the area's forest ecosystems, ensuring the project meets the biodiversity, habitat, and viability requirements of native species of concern.

Common conservation ground can best be achieved when proposed actions are 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 should not exceed those scientifically necessary and capable of achieving fire risk reduction and ecological purpose and need goals. Removal of mature and old fire resistant trees, unnatural logging removal or excessive manipulation of mature and older established forest overstory, excessive thinning in ponderosa pine stands, commercial logging-thinning in mixed conifer forest habitat, and use of heavy logging machinery would adversely impact forest ecology; biodiversity; vegetation; soils; wildlife, avian, botanical & other species of concern populations and habitat; resulting in further degradation of the ecological integrity, wildlife habitat, soil hydrology, and natural systems in and around the project area. Indeed, in general scientific research largely recommends against the efficacy of thinning-logging to accomplish fire risk and fuels reduction objectives, noting that logging in forest ecosystems- (particularly mixed-conifer systems) is most often ecologically detrimental, and can often result in actually increasing the risk of severe fires.

The agency's apparent wide-latitude proposed in regards to slash pile and felled tree removal is also a cause for concern. Slash piles left in the Davis Fire area have been documented as significantly increasing fire's severity and impacts. Numerous old slash piles and remnant log-deck piles are scattered across the Deschutes National Forest, all increasing the risk and potential extent of severe fire impacts across the area's forests. It is a cause of significant concern that this proposed fuels and fire-risk "reduction" project permits the retention of fire-prone ecologically unnatural slash piles, whether as purported for wildlife or other unwarranted rationale. Similarly, burning slash piles can irreparably harm the forest soils beneath. As this project is developed, it must disclose and address fire-risk increases and ecological harms posed by slash piles, and the logging and thinning/mowing/burning actions themselves; including disclosure of applicable scientific research and management pertinent to these concerns.

Similar with other projects in the region, 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. Natural interior mixed conifer forest stands should be ecologically maintained allowing natural cyclic processes, conditions, and functioning. Management actions should be strategically designed and placed to augment, rather than hinder, natural processes, and to provide for the viability and habitat needs of dependent forest species;

- C. Protecting soils and native plants by requiring low impact light machinery in all interior forest areas where machinery is employed;
- D. Protecting waterways and riparian areas, prohibiting machinery use and commercial felling in these locations;
- E. Seasonal restrictions on project implementation protecting avian species during nesting and fledging periods;
- F. Other provisions as ecologically appropriate as noted below.

The notice proposes a series of varied thinning actions, all purported to reduce the risk of severe uncharacteristic fires. As has been documented by scientific research and post project surveys, such actions have the potential to be beneficial or harmful, dependent upon the extent of thinning employed, the type of forest Plant Association Groups (PAGs) in which this is located (science recommends small diameter tree thinning in dry pine frequent fire areas only; leaving mixed conifer, high elevation, and moist forests unthinned by commercial logging); dependent upon the location (thinning is not recommended in species of concern wildlife areas, areas of ecological significance, near salmonid waterways, etc.) and timing of thinning actions. Such actions work best when they are kept within the parameters of greater scientific consensus rather than controversy.

Care must be taken limiting thinning to ensure sufficient trees and forest stand structure remain to provide for the diverse habitat needs of dependent wildlife species, and to provide for both localized and landscape scale forest ecological integrity. Management actions that excessively thin forests can be antithetical to project goals of reduced risk of severe fires and enhancing forest ecological resiliency.

Excessive logging-thinning actions increase and exacerbate the risk of severe fires, as fire resistant mature and old trees are soon replaced with fire-prone brush and small diameter trees. Ecologically, varying somewhat by tree species and localized conditions, trees begin to have inherent fire-resistance as they increase in girth, bark thickness, and branch height, beginning at about 6" to 8" in diameter. Former USFS Chief Dombeck is quoted as stating there are no valid rationales for cutting trees above 12" diameter (dbh) in fuels reduction projects.

Additionally, soils disturbed and impaired by heavy logging machinery cannot support the healthy subsurface soil microbial communities and hydrological functioning necessary to maintain healthy trees and forests. Existing populations of invasive plants can be further spread, and new introductions of exotic invasive plants may occur as a result of soil disturbing logging-thinning actions.

Limiting thinning to only smaller diameter trees, employing variable diameter thinning limits as appropriate to PAG site-specific conditions, has more scientific and ecological support. For example, limiting felling to trees <12" dbh, or a range of species specific variable diameter limits from 14" to 16" at most, is less scientifically controversial and more ecologically capable of achieving project purpose and need goals.

Project analysis will need to adequately address and disclose the extent of potential adverse impacts from proposed biomass utilization, identify project areas where such utilization may result in ecological harms and should not be part of this project. Scientifically non-controversial restoration methods should be the only basis for biomass inclusion in this project. Biomass utilization should be limited to that which can be done within ecologically beneficial parameters, and should not result in adverse harms to forest ecological integrity, functioning, and/or wildlife habitat needs.

The notice states this is an HFRA project based upon area CWPPs. In utilizing these plans, to be both credible and practical, the agency must establish a clear set of ecologically feasible priorities, recognizing there are limited resources. The agency also is required to base its actions on credible scientific research recommendations, abiding by the NEPA, and not defer the management of federal forest lands to CWPPs alone (as these are often politically influenced, failing to comport fully with

effective fire risk reduction methods). Concerning effective fire risk reduction, the most important focus of WUI efforts should be within ½ mile of residential population areas, with particular emphasis on the private lands residences themselves. As this is purported to be a collaborative project, and as attainment of its purpose and need goals is truly dependent upon cooperative actions taken upon area private lands, the project analysis must address the incorporation of actions, conditions, and impacts on these areas as a foundation of its proposed actions.

HFRA Ecological & Legal Provisions & Congressional Intent

While HFRA is the law of the land, it must be employed appropriately as Congress intended.

Congressional intent is clear in the text of the HFRA, requiring:

1. The primary purpose of HFRA projects must be fuels reduction around wildlife-urban intermix or interface communities (WUI);
2. WUI communities must meet specified population density requirements, ensuring that such projects are not misused to commercially log interior forests far from human communities where population density is sparse, and where people have historically knowingly chosen to live within forest areas.
3. Project extent to be confined within ½ mile to 1.5 miles maximum from concentrated areas of human residences.
4. USFS must use approved methods of fuels reduction including thinning and prescribed fire, and may not propose commercially motivated, quota driven logging. HFRA §6511(2) provides: “The term ‘authorized hazardous fuel reduction project’ means the measures and methods described in the definition of ‘appropriate tools’ contained in the glossary of the Implementation Plan.” The implementation plan glossary says that “appropriate tools” include “thinning,” but the definition does not include shelterwood or any form of regen harvest.
<http://www.fireplan.gov/reports/11-23-en.pdf> (page 18: Glossary says “Appropriate Tools: Methods for reducing hazardous fuels including prescribed fire, wildland fire use, and various mechanical methods such as crushing, tractor and hand piling, thinning (to produce commercial or pre-commercial products), and pruning. They are selected on a site-specific case and are ecologically appropriate and cost effective.”). The USFS does not have a wide range of discretion here, as Congress is clearly specific in delineating the types of projects that are authorized under HFRA. This definition lists several forms of fuel reduction only one of which involves commercial logging (i.e. thinning).
5. There are at several reasons why excessive logging methods are not an appropriate tool for fuel reduction:
 - Excessive thinning results in forest conditions that are more hazardous than doing nothing. Opening forest stands will result in forest conditions that are hotter, dryer, and windier than other treatments or no action. Thinning opens stands to greater solar radiation and wind movement, resulting in warmer temperatures and drier fuels throughout the fire season. [T]his openness can encourage a surface fire to spread, ...USDA Forest Service; Influence of Forest Structure on Wildfire Behavior and the Severity of Its Effects, November 2003.m
<http://www.fs.fed.us/projects/hfi/2003/november/documents/forest-structure-wildfire.pdf>
 - Opening up closed forests through selective logging can accelerate the spread of fire through them because a physical principle of combustion is that reducing the bulk density of potential fuel increases the velocity of the combustion reaction. Wind can flow more rapidly through the flaming zone. Thinned stands have more sun exposure in the understory, and a warmer microclimate, which facilitates fire (Countryman 1955).

- C. [F]uel reduction activities – particularly mechanized treatments – inevitably function to disturb soils and promote the invasion and establishment of non-native species. Pile burned areas associated with the treatments are also prone to invasion (Korb et al. 2004). Annual grasses can invade treated areas if light levels are high enough, leading to increased likelihood of ignition, and more rapid spread of fire, which can further favor annual grasses (Mack and D’Antonio 1998). This type of feedback loop following the establishment of non-native plants may result in an altered fire regime for an impacted region, requiring extensive (and expensive) remedial action by land managers (Brooks et al. 2004). Odion, Dennis. 2004. Declaration in *NWEA v. Forest Service*. *citing* Countryman, C. M. 1955. Old-growth conversion also converts fire climate. U.S. Forest Service Fire Control Notes 17: 15-19.
- Excessive thinning, without or without replanting, will also result in the establishment dense growth of young trees that are one of the most hazardous types of forest structure because they provide a nearly continuous bed of resinous fuel close to the ground. Countryman, C.M. 1955. Forest stand conversion also converts fire climate. Fire Control Notes 17(4): 15-19.
- Logging creates large amounts of hazardous logging slash that is never full treated. Incomplete treatment of logging slash results in increase fire hazard relative to no action. See Crystal L. Raymond. 2004. The Effects of Fuel Treatments on Fire Severity in a Mixed-Evergreen Forest of Southwestern Oregon. MS Thesis. http://depts.washington.edu/nwfire/publication/Raymond_2004.pdf

To comply with HFRA, the USFS must employ effective small-diameter thinning, retaining enough canopy-closure to maintain cool, moist understory conditions and suppress excessive tree regeneration.

6. HFRA only grants authority to remove “hazardous fuels” (HFRA §6512(a)). The USFS cannot remove any tree that provides useful shade that helps keep fuels cool and moist or that helps suppress the growth of future ladder fuels. Most trees over 15” dbh and the overstory trees in the shelterwood units are fire resistant and help reduce fire hazard, so they are not hazardous fuels. Removing these larger fire resistant trees is not authorized by HFRA because these are not legally “hazardous fuels.”
7. HFRA requires that authorized projects be consistent with the applicable Deschutes Land Resource Management Plan standards and guidelines. HFRA Section 102(b) says “An authorized hazardous fuel reduction project shall be conducted consistent with the resource management plan and other relevant administrative policies or decisions applicable to the Federal land covered by the project.” HFRA only authorizes projects that are consistent with existing management plans. This proposed project must fully conform with the Deschutes Management Plan or use the requisite NEPA process for non-HFRA projects.
8. This project will result in the reduction of native ungulate cover in the subwatershed. Project analysis fails to adequately address this issue, or strategically design the project to better address impacts to wildlife, including native ungulate species. In the HFRA Congress struck a balance between competing objectives by accelerating only those fuel reduction projects that are fully consistent with the pre-existing management plans and wildlife protection/mitigation standards. The FS must ensure that the will of Congress is upheld by assessing accurately

whether the proposed logging is consistent with its management plans and wildlife provisions, including cover needs.

9. This project may degrade old-growth forests in violation of the HFRA and the east side screens. The USFS must ensure that this project will not reduce snag habitat and raptor habitat. The FS must retain and protect all old trees and old forest characteristics because:
 - HFRA requires the FS to maintain and restore old-growth forests regardless of tree size. This includes all trees <21” that have orange bark and other old growth characteristics, as well as trees above 21” dbh. The HFRA says that the structure and composition of old growth shall be fully maintained and restored.
 - While the area is within the NFP, its forests are east of the Cascade crest, and have many similar ecological considerations to those addressed by the “eastside screens.” As such, these recommendations and standards should be incorporated into this project. The east side screens require that all vegetation management projects move stands toward the historic range of variability. Since all mature and old trees and large snags are far below the HRV, The FS must retain large snags and pre-fire suppression mature and old trees regardless of whether they may be > or <21” dbh.
 - The FS should follow these requirements by retaining not only all trees over 21” dbh but also smaller trees that have old growth characteristics such as Ponderosa pines with yellowing bark. Large snags must be reasonably retained, keeping workers out of the hazard zone as possible. It is highly unlikely that large diameter well-rooted standing snags would be in danger of falling in a smaller scale true fuels reduction/restoration thinning project, reasonably minimizing risks to workers and equipment. Large-tree snag recruitment must be provided by retaining adequate numbers of “extra” trees that will eventually become snags. Numerous avian wildlife species nest in mature and old-growth forests, and potential nesting habitat must be protected.
 - Where plans do not “fully maintain and restore” old-growth, HFRA §102(f) requires that projects— “focus largely on small diameter trees, thinning, strategic fuel breaks, and prescribed fire,” *and*, to the extent consistent with fire resilient stands, “maximize the retention of large trees” appropriate to the forest type.
- Prioritizing limited resources is one of the primary goals of the HFRA. The Secretary of Agriculture is required by HFRA §103(a) to develop an Annual Program of Work that identifies this project as a higher priority than others that are not going to get done. The FS must disclose how this project is part of an "Annual Program of Work.”
- The FS must ensure that similar fuels reduction work is conducted on private lands, including the creation of defensible space around all dwellings and structures. Absent such private lands cooperation, the legitimacy of the claimed fuels reduction needs, and landowner interest in this project, is called into question. Area residence owners, especially those whose structures have adjacent contiguous dense stands of trees with abundant ladder fuels touching houses and structures, must cooperatively participate in this project for the fire risk efforts to be meaningfully effective. Without such cooperation, these conditions would negate any potential beneficial fuels risk reduction that may result from this project. Indeed, without such participation, fire igniting in these at risk private lands homes could easily spread into adjacent private residences and public lands forests. The agency and county must address this serious significant issue before the proposed W. Tumbull HFRA project may be considered a valid fuels reduction project. Area residential owners must conduct the requisite defensible space work that is needed to make the proposed work meaningfully capable of actually reducing fire risk to area homes. Work needs to be conducted addressing fuels and fire risk issues stemming from thick stands of trees

immediately adjacent to roofs and wooden sidings, out-structures and firewood piles. As the foundation of this project is based upon protecting area homes, without private landowner cooperation, the project has no viable foundation.

- The FS must address actual area continuity of fuels capable, assessing if project area forests are capable of carrying a forest fire across the project area and into private homesites. CWFPPs cannot be applied as a broadbrush landscape-scale approach that includes the entire area watershed, irrespective of whether the fuels conditions are continuous enough to carry a fire across the entire project area. The FS must not defer carte blanche to the county's general broadbrush plan, but must instead conduct the NEPA required site-specific analysis and accurately assess actual fuels continuity and potential for fire-spread to residential homes. Overall, use of the CWPP absent the requisite fuels risk continuity analysis - and underlying fire risk reduction strategy helping to accurately locate unit areas where thinning is truly necessary - undermines the effectiveness of the project, and extends logging across the area whether it is necessary or not. Site-specific ground truthing is necessary or the resulting project could violate NEPA requirements. The FS is required to develop a fire-risk reduction strategy, based upon actual site-specific vegetation and fuels patterns and connectivity, utilizing existing natural openings, combined with past logging and road openings - to allow for effectively containing fires in much of the area, and preventing spread to occupied areas. The project should be reassessed and redesigned as appropriate to effectively incorporate these conditions, potentially allowing less of the forest watershed to be commercially thinned. This is especially an issue in thinning trees >12' dbh over ½ to 1 mile from residences.
- Cumulative impacts to wildlife species from past logging and road building are extensive and significantly severe across much of the area. The EA must accurately assess and disclose the many adverse impacts of this project to numerous wildlife species. We are concerned that this project would likely further harm wildlife species while failing to effectively address fire risk reduction to area homes. Additionally, adjacent thinning projects, and other area thinning and burning projects must be disclosed and assessed as part of this project's cumulative impacts analysis.
- Basal area formulas and/or 'trees per acre' blanket formulas (as proposed) used to determine logging markings are inaccurate, failing to be based upon the historical stand density and composition realities of project area. Use of inaccurate formulas would likely further reduce mature-sized fire resistant trees, and remove essential forest stand structure, leaving area forests - that already have had too many mature and old growth trees removed by logging - with even less stand density of mature trees than was historically present. Commercial-timber motivated reductions of historical stand structure violates HFRA provisions.
- Agency marking should concentrate on fire-prone small diameter trees, ladder fuels, and thickets throughout approximately 70% of the project's units, while retaining mature-sized 14" to 20.9" dbh and greater diameter trees. The project as proposed needs to be changed to comply with HFRA's mandates regarding appropriate fuels reduction thinning.

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

- Mature and old growth forest areas size and location;
- Listed species and species of concern in and adjacent to the project area;
- Landscape scale and localized wildlife connectivity, including migration, foraging, and dispersal habitat and routes;
- Soil conditions;
- Existing invasive plant population and location concerns, and invasive exotic plant introduction and spread issues;
- Ecosystem and soil hydrological patterns,

- Waterway conditions, riparian areas, and affected aquatic species of concern;
- Excessive road density issues, and plans to remove excess roads. No new/temporary roads should be proposed. Conditions of closed roads should be disclosed; those that have grown in with trees should remain closed and unused;
- Inventoried and uninventoried roadless areas, and/or areas of significant ecological resource value or concern in or nearby the project area;
- OHV use and 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 recent current fire and management history;
- PAGs, historical and current stand conditions, and natural variations for proposed units and adjacent areas;
- 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 NEPA analysis for this proposed project should develop a full range of different scientifically and ecologically substantiated action alternatives. Additionally, we recommend the agency employ an EIS, due to significant ecological and community concerns, rather than an HFRA EA. 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, Sunriver, Lava Cast, SAFR, Glaze Meadows, Deadlog, EXF, and other fuels reduction thinning styled projects.

We recommend a public field trip and follow-up meeting to the proposed West Tumbull project area. We look forward to discussing these and additional conservation concerns with agency planning staff soon.

For our natural 'wild' forests,

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