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**Comments on the Proposed
Met Fuels Reduction Project Preliminary Decision Memo**

Shane Jeffries, District Ranger,
Beth Peer, Environmental Coordinator,

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 Sisters Met Fuels Reduction Project Preliminary Decision Memo. The Met 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 1,000 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. Implementation of the Met 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 Met Project is located.

Project Location:

The project is disclosed as being outside of, and between, the Wildland Urban Interface areas as designated by Sunriver (to the south) and Bend (to the north) Community Wildfire Protection Plans; with the project being located between Hwy 41 to the west, and the Deschutes River to the east; covering R 11 E, T 18 S, Sections 22, 26, 27, 33; R 11 E, T 19 S, Sections 4, 5, 8, 9; Deschutes County, Oregon.

Description of project area:

- Clear cut logged in the 1920's, then acquired as part of the Deschutes NF;

- Due to past logging, there is almost a complete absence of large old trees and open fire-maintained ponderosa pine stands;
- existent mature and old trees are both rare and of significant ecological importance for forest structure, long-term resilience, and wildlife habitat;

LRMP Designations:

- **Wild & Scenic River;**
- **Intensive recreation;**
- **Scenic views.**

Proposed Action:

- 188 acres of thinning, mowing, and underburning;
- 141 acres of commercial logging, felling trees up to 21” dbh;
- 128 acres of small diameter thinning, felling trees up to 12” dbh;

Purpose and Need:

- Not disclosed as such, other than minimally under: “Rationale and Decision;”
- “because it will reduce hazardous fuels and provide defensible space along Hwy 41 and other roads, which are important evacuation routes.”

NEPA Analysis:

- Proposed use of a Categorical Exclusion from NEPA Analysis;
- Claims there are no Extraordinary Circumstances;
- Plans to use FSH 1909.15, C30, Category 31.2(6) timber stand improvement such as brush control to reduce fire hazard; 31.2(12) timber harvest less than 70 acres with less than .5 mile of temporary road;
- Claims that the 141 acres of commercial logging will actually be less than 70 acres “after considerations for cultural resource avoidance, and wildlife retention patches, the net acreage of these three units is approximately 70 acres.”

NEPA history:

- Listed in the SOPA in 2004;
- Was originally part of the East Tumbull Project 2005 analysis;
- Was dropped from the East Tumbull decision as the project units are not within the WUI area;

Significant Environmental, Cumulative Impact, Legal, Scientific Controversy, and Extraordinary Circumstances Concerns

Our organizations have reviewed the extremely minimal, legally, scientifically, and environmentally deficient information contained in the 7 page notice for this proposed project decision. We have strong conservation and legal objection to the proposed project actions and the legally non-compliant proposed CE decision. We strongly request the agency withdraw this notice and comply with federal environmental policy laws by conducting the requisite NEPA analysis process for this project. The following outline emphasizes the issues of legal and environmental significance necessitating an EA at a minimum for this proposed project:

- The project is a connected action to the East Tumbull, Sunriver, and South Bend Projects;
- The Project will have significant cumulative impacts expanding the WUI management and use disturbance of the above projects outside WUI boundaries into interior forest wildlife habitat;

- The project will have significant Cumulative Impacts when combined with the East Tumbull, Sunriver, South Bend, Lava Cast, Hwy 97 widening; Oz, West Tumbull, and Snow Fuels Projects, 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 East Tumbull Project logging, thinning, mowing, and burning actions;
- The analysis noted was completed in 2005, was largely for WUI areas alone, is outdated, and fails to assess significantly changed conditions as a result of extensive logging thinning throughout the greater Deschutes National Forest area;
- There exists an excellent opportunity to assess the actual impacts on forest ecology, structure, wildlife habitat and populations, recreation, and community interests; and whether the East Tumbull project met or failed to meet its 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 analysis process;
- The project area is a high visibility recreational access and use area, designated in the Deschutes NF LRMP as Wild and Scenic River, Intensive Recreation, and Scenic Views; impacts from the related East Tumbull Project have proven excessively detrimental to all of the above natural and recreational qualities, and should not be permitted on additional Forest Service lands of these resource significant designations without assessing the actual impacts of East Tumbull, and refining proposed actions to reduce the scale of detrimental impacts, better incorporate scientific recommendations, and more capably achieve purpose and need objectives.
- The Deschutes River and the surrounding forest areas are treasured cultural, recreational and natural resources, which the above management designations clearly reflect. This in itself represents “extraordinary circumstances.” Combined cumulative impacts in the area already represent excessive logging, thinning, and management action harms to these natural resource values. Failing to utilize this opportunity to thoroughly assess the actual direct and cumulative impacts of East Tumbull and other area projects, and instead relying on speculative outdated 2004-05 analysis assumptions when actual site-specific verifiable information is available, is a violation of the clear requirements of the NEPA.
- The time period between 2005 and 2009 represents four years of potential for additional site-specific, wildlife, and species of concern surveys in and surrounding the proposed project area. The notice fails to disclose if any missing information – such as a lack of current surveys for presence in the project area of species of concern – have been acquired during the past four years. As the agency proposes to implement this project, it must disclose if any new relevant surveys have been conducted during the past four years in the project area, or within the East Tumbull Project area assessing actual rather than speculative impacts, and assess these in a new current NEPA analysis based upon the greater forest area’s significantly altered actual conditions.
- Over the past four years since the 2005 East Tumbull analysis was completed, significant new scientific research studies and recommendations have occurred which must under the mandates of the NEPA be incorporated into proposed project actions. The notice evidences no disclosures or acknowledgement of this new research, nor any

- 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 proposal to remove trees between 12” up to 21” dbh 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.
- 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 Met 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 notice fails to 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. The agency’s proposal of a 21” dbh limit for the Met project is arbitrary and capricious, and not based on actual stand conditions and ecological resource objectives.
- Plans to pile and burn slash are in contravention to the scientific research conclusions regarding the severe soil community damage such burning causes,

- 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 CE categories proposed for use are intended for small scale minimal maintenance management projects, not cumulatively connected, sequentially segmented, combined large-scale logging projects. While Met by itself appears small, as acknowledged in the notice itself, this is a connected action with the East Tumbull, and by virtue of proximity and premise, with the areas other above noted logging-thinning management projects. As such the project as proposed fails to meet the stated FSH legal requirements for a CE decision.
- The notice states that commercial logging would occur on units 120 across 25 acres, 122 across 17 acres, and 176 across 99 acres, for a total of 141 acres. The notice claims that over half of these acres will not be logged or affected by logging, stating that the total acres logged would be less than 70 acres. Given that current agency practice for wildlife leave areas is equivalent to only 10% of an area being untreated; that such leave areas are not unaffected by the close proximity of logging and logging machinery, falling and removal actions; this claim is environmentally unsubstantiable and legally unreasonable. The extent of acres having direct and cumulative impacts as a result of proposed project actions precludes a CE being utilized for this decision, requiring an EA for this project.

The members and volunteers of our organizations, and quite a number of 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 East Tumbull Project's logging and thinning. Logging and thinning actions have harmed removed essential wildlife cover, devastated natural scenic qualities, and intruded and harmed in forest stands and aspen groves alongside the recreationally popular Deschutes River trail. Piled slash and logs not removed for commercial purposes if burned as planned would further unacceptably harm area soils and natural qualities, including aspen wetland areas. Extending such egregiously excessive logging, thinning, burning, and mowing harms beyond East Tumbull's already excessive WUI boundary 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 analysis is needed for this project, and the legally deficient notice must be withdrawn and a new scoping notice issued for the proposed project that incorporates the above disclosures, issues, and concerns. 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 and is positioned above a horizontal line.

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