29 April 2005

Friends of Living Oregon Waters (FLOW)
P.O. Box 2478
Grants Pass, OR. 97528

Re: Scoping Notice for the BLT Vegetation Management Project

Dear Phil Cruz, Chris Mickle and the Deschutes National Forest:

We thank you for the opportunity to provide our scoping input on the BLT Vegetation Management Project. We have several concerns and suggestions as the Deschutes National Forest develops its DEIS for this project. These comments will be emailed to the Deschutes National Forest via Environmental Coordinator Chris Mickle, and a hard copy will be mailed to the District Ranger.

FLOW is a network of more than 400 Oregonians who advocate for the protection of Oregon's most precious waters from pollution and development. We use educational outreach, advocacy, and legal oversight to further our goals in promoting healthy, natural streams, rivers and estuaries in Oregon.

The Little Deschutes is a federally designated Wild and Scenic River. It possesses outstanding water quality, scenic and fisheries values. Oregon has the most extensive Wild and Scenic River system in the Lower 48, and the Little Deschutes is a rugged element of this system that is worth a high degree of consideration and preservation.

Comments on the BLT Vegetation Management Project:

**The Little Deschutes River:**

1. As stated above, the Little Deschutes is federally designated as recreational under the Wild and Scenic Rivers Act. It was included in the system because of the ruggedness of the canyon, its fisheries, and other outstanding values of the Little Deschutes river and canyon. We encourage the Deschutes National Forest to demonstrate that its management strategy, methods, and goals are consistent with the Outstandingly Remarkable Values of the Little Deschutes River. Activities that occur within or near the Wild and Scenic River corridor must "maintain or improve" the outstandingly remarkable values, as designated by Congress. The DEIS should reflect a thorough consideration of this mandate, and the possible impacts to the scenic, aquatic, and biological resources of the Little Deschutes Canyon should be clearly enumerated.
2. The Scoping Notice accurately noted that the Little Deschutes is listed as water-quality limited stream. The DEIS should clearly describe how the proposed action will contribute to an improving trend in the parameters for which the Little Deschutes is listed as Water-Quality Limited. The scoping notice stated the Deschutes National Forest's intention to meet this standard, and we would

encourage the DNF to clearly describe the mechanisms by which the proposed thinning, burning and other treatments will enhance the health of the Little Deschutes watershed. We are concerned that some of the more intensive elements of proposed logging may contribute to sedimentation in the stream and/or warming of small and intermittent streams that flow into the Little Deschutes. Any thinning occurring near riparian reserves in the BLT VMP should be designed with this at the forefront of the DNF's concerns. Indeed, any activities that may affect the Wild and Scenic Corridor or the quality of the water feeding into it should be scrutinized for possible impacts to stream temperature and sedimentation.

3. The Little Deschutes Canyon is, in many places, remarkably scenic. We encourage the DNF to minimize visual impacts in proximity to the Little Deschutes River. In so doing, the DNF should also assess how any possible visual impacts may combine with past management activities to diminish the scenic value of the Little Deschutes.
4. The DEIS should clearly describe the possible impacts of the project on fisheries resources in the project area. The DNF should provide the public with a full reckoning of all sensitive species in the area, and should demonstrate that the action either enhances or maintains quality of habitat for these species. Fish are an important resource for the Little Deschutes River, and actions that could increase sedimentation or stream temperatures in their habitat should be avoided.

**Fire and Forest Health**

1. We would ask the DNF to clearly present the scientific underpinnings of their management strategy and goals. There is a considerable amount of scientific uncertainty regarding the role of small and large fires in the history of dry Western forests. The DNF should be clear in its presentation of its rationale for how it plans to enhance forest health through thinning and burning treatments. Part of this analysis should be a thorough assessment of the historical fire regime and how current conditions depart from desired conditions. Additionally, the DNF should honestly appraise the limitations of their knowledge of the BLT Project area, and provide the public with possible but unintended consequences of their management strategy, given a certain level of scientific uncertainty regarding fire regimes and the usefulness of different stages of forest development to different species.
   The Scoping notice states,

> "Current conditions on the landscape indicate that forests are moving toward late seral stages, with stand structure becoming more complex and more susceptible to stand replacement events. Stands once dominated by large trees (greater than 21 inches in diameter) have a steadily increasing amount of smaller trees."

   The DNF should present data to corroborate these claims, though we do not doubt that many stands have become overly stocked with smaller trees. Still, it is crucial for the DNF to establish a desired condition for the BLT project area

(What metrics is the DNF using to measure forest health? Are these supported by scientific literature and site-specific analysis?), and to thoroughly analyze the beneficial as well as the detrimental impacts of fire in the BLT area ecosystem. We encourage the DNF to be as scientifically and statistically rigorous as possible in this effort, as there is significant debate regarding the relative benefits to different types of stands of different intensities of vegetation management.

2. In general, we would support pre-commercial thinning as the most benign method for reducing the most hazardous fuels in the BLT project area. The removal of large trees does not demonstrably reduce the risk of fire danger, and thinning near riparian areas may diminish water quality and aquatic habitat in the BLT project area. Prescribed burning may also be a more appropriate method of enhancing forest health than invasive logging activities that drastically change the character of the forest and disturb soil, vegetation and aquatic resources.
The DNF seeks to enhance the large-tree component of its forest, but in so doing we are concerned that it may, at least temporarily, reduce this element of the forest. The Scoping notice states,

> "In many areas the large trees do not dominate the forest sufficiently to provide adequately for species that depend on late- and old-structure habitat. Overcrowding and competition with the young, smaller trees are causing the large-tree component to decline. This may occur slowly through insect/disease outbreaks, or more rapidly through large-scale fire events."

The DNF should clearly describe what it considers to be the historic fire regime in the BLT project area, and it should also offer the public an understanding of the scientific uncertainty regarding the severity and frequency of large fires on the forest, particularly if this assessment is based on fire scar data (Baker and Ehle, 2001). Indeed, larger fires may also play a role in the maintenance and enhancement of late-successional species. Moreover, uncertainty plays a large role in the management of fire regimes in Western forests; we encourage the DNF to shape the BLT project with an understanding that drastic actions, taken despite a high level of uncertainty, may produce undesired effects.

In managing towards the goal of re-instating a specific forest structure and fire regime, the DNF should take care to accurately assess the impacts and possible ecological ramifications (particularly with regard to watershed health and habitat viability) of its management activities in the short-term. That is, the DNF should explicitly state the possible short-term impacts of reducing canopy closure levels in older stands of forest, and how it anticipates wildlife to respond to these changes in habitat. Given the tenuous nature of population levels for some sensitive species, we would encourage the DNF to be as careful as possible to enhance habitat without drastically impacting it in the short-term. We hope the DNF supports its conclusions about the effects of current forest trends and the expected outcomes of its management with population-level data for resident wildlife species, particularly sensitive species and MIS.

3. The Scoping Notice asserted that the EIS will inform the decision-makers on the BLT project as to the extent to which it will be necessary to "salvage dead and

dying lodgepole pine." We encourage the DNF to give an accurate, clear definition of the "dead and dying." Certainly trees may appear to be under duress from disease and still play an important role in the forest ecosystem. In particular, we are intrigued to know how the DNF defines "dying" trees. We encourage the DNF to be as conservative as possible in the application of this term, particularly with regard to large, older, ecologically valuable trees.

4. The DNF must clearly articulate with a well-defended scientific rationale how selective harvest and commercial thinning will enhance the health of older trees in the forest. The DNF should not necessarily extend the problem of small-tree fuel loading to trees that are commercially valuable. In fact, removing a significant number of large trees may exacerbate the very problems the BLT Scoping Notice cites as its primary motivation—the loss of stands dominated by older trees. We are skeptical that the proportion of commercial versus pre-commercial thinning reflects the needs of the forest, or even a plausible strategy for attaining the goals outlined in the Scoping Notice. If the DNF intends to "maintain or improve late and old structured stands, and reduce the risk to the ecosystem posed by large-scale, catastrophic outbreaks of insects, disease, and fire," it must clearly articulate how its treatments will achieve this goal while maintaining the viability of the habitat it treats. Additionally, the DNF should assess the beneficial role of fire, insect, and disease disturbance in the BLT project area. What the DNF deems "catastrophic" may, in fact, be a somewhat natural but large disturbance event. In either case, the EIS should develop this analysis with as much scientific rigor as is possible.

**Fire and Community/Firefighter Safety**

1. The DNF's desire to promote firefighter safety through its silvicultural practices may be somewhat misguided. Randall O'Toole has suggested that changes in firefighter mortality can be most effectively linked to car crashes, helicopter/plane crashes, and health risks for an aging firefighting population. We would ask that the DNF corroborate its claim of increasing firefighter safety by presenting scientific evidence that specifically links their proposed action to firefighter safety. We suspect that such evidence does not, in fact, exist. It is somewhat disingenuous for the DNF to use firefighter safety as a rationale for intensive management practices if no evidence exists to demonstrate that the prescribed actions will enhance firefighter safety. While we think that firefighter safety is of utmost importance, we question the relevance of this concern to the specific management actions being proposed.
2. Similarly, we absolutely agree that it is crucial to protect people and resources on the "urban-wildland interface." Yet, we question whether the DNF intends to establish a scientific rationale that links successful protection of these resources to the specific management practices proposed in the BLT Project. Of course, the DNF is well aware that no level of thinning is an effective measure for fire control if the slash and small fuels are not adequately treated. We support DNF efforts to mitigate these effects by hand-piling and burning slash, particularly in pre-

commercial thinning stands. Still, even these treatments in outlying areas may not be strongly linked to enhanced success for protecting homes and resources on the "urban/wildland interface." The most important factor for protecting resources in at-risk areas may be to reduce fuels and flammability in the areas immediately adjacent to them. These specific, small-scale, targeted fuels and flammability reductions are the most important element of protecting homes and property from wildfire. The DNF should indicate this in its EIS, or if it has credible scientific data indicating that remote fuels treatments play a large role in enhancing the safety of these resources during wildfire, we look forward to seeing it cited and described in the EIS. We encourage the DNF to consult Jack Cohen's work on this topic, particularly the following paper:

Cohen, Jack D. 2000. Preventing disaster: home ignitability in the wildland-urban interface. Journal of Forestry 98(3): 15-21.
National Fire Protection Agency (NFPA). 1991. *Protection of Life and Property from Wildfire*. NFPA 299.

**Soils Resources**

1. We are pleased that the DNF considers the maintenance of soil productivity to be of paramount concern in the BLT project. We encourage the developers of the EIS to fully assess the risk of erosion near the Little Deschutes and its feeder streams. This type of soil impact can have a marked impact on downstream fish and water quality resources, as you well know.
2. The DNF should extensively analyze the cumulative impacts of this project in all facets of its analysis, from aquatic resources to wildlife resources. It is particularly important, however, for the DNF to present a reliable analysis of the impacts on soil productivity of intensive logging activities such as commercial thinning or selective harvest. The DNF should describe where and how heavy equipment may be used, and how this activity may diminish soil productivity. We hope the EIS provides a thorough analysis of the baseline conditions in the Little Deschutes area in terms of soil productivity. Past management actions may have impacted the soils in different areas, and the DNF should provide adequate analysis to defend its assertion that its management activities will maintain or improve soil productivity. The DNF should include a description of the models used, the field data gathered, and an analysis describing how this data supports the conclusions of the EIS.

**Wildlife**

1. The DNF should consult all relevant literature, as well as present site-specific information to support its claims about the impacts of the BLT project on wildlife. Particularly for threatened, endangered, and sensitive species, the DNF has a responsibility to provide accurate, site-specific information that supports its management direction.
2. We hope the EIS includes a thorough analysis of wildlife impacts, partially relying on MIS data. As much as possible, the DNF is required to use population-level data specific to the project area to establish the condition of wildlife species

in the area, as well as the possible impacts to their population levels. The DNF is required to demonstrate that it will maintain viable population levels of vertebrate wildlife species, and we suggest that this analysis, also, be as detailed as possible and rooted in site-specific data wherever possible.

Again, we are grateful for the opportunity to offer our input to the Deschutes National Forest on the BLT Project. We hope that the DNF gives a high degree of consideration to protecting the Little Deschutes from any action that might diminish its remarkable biological and scenic quality. Furthermore, we hope that the process goes forward as transparently as possible. In that vein, we ask to be included on any future mailings or public notices regarding the BLT Project (we did not receive a Scoping Notice for this project, though we asked for one).

Respectfully,

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