

From: Karen Coulter
for Blue Mountains Biodiversity Project

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To: Holly Jewkes, Forest Supervisor, Deschutes National Forest
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Blue Mountains Biodiversity Project comments on the
Visual Analysis Forest Plan Amendments Proposal

While we appreciate that the changes proposed do not change the existing language as to what needs to be determined by the landscape architect, there were probably reasons for designating a landscape architect to fulfill this role regarding scenic areas, scenic views, and areas with high public recreational and inholding use such as the Metolius Basin and Black Butte area, as well as along scenic highways leading to Lakes, Wilderness Areas, campgrounds and other areas of high recreational use on the Deschutes. It is quite possible that an environmental planner or recreation planner would not make the same aesthetic value determinations and recommendations as a landscape architect, potentially leading to greater degradation of scenic views and recreational aesthetics. This would be a substantive change, not just an administrative convenience change. We are especially concerned regarding environmental planners filling

this role, as they seem to be in charge of setting up meetings and orchestrating public process to enable timber sales and other planned management to proceed. Even if the determinations and recommendations are made by recreational planners, these staff members may not be trained to recognize and preserve scenic and recreational aesthetic values, instead increasingly degrading recreational site and scenic view quality to accommodate increasing visitors or increased demand for amenities such as electricity, parking space, or buildings without sufficient regard for the natural character and appearance of the area that originally attracted visitors.

The broader issue of concern is that it seems arbitrary and capricious to start (or continue) amending the existing Forest Plan in a piecemeal fashion even while a full Forest Plan revision of the Northwest Forest Plan is in progress. Amending Forest Plan provisions that are inconvenient to agency resource extraction goals one by one decreases the level of public participation involved below that attendant to a full Forest Plan revision process. This can be seen by the greater public attendance at Northwest Forest plan revision meetings compared to limited public awareness and response to individual public scoping letters such as this.

We are especially concerned by the Forest Service's

attempt to use Categorical Exclusions for rushing through piece meal revisions of the existing Forest Plan, with associated greatly reduced environmental impact analysis (no EIS, as is required for Forest Plan revisions) and less information available for the public to consider, as well as a truncated timeline that makes it more difficult for public concerns to be fully heard and remedied. This use of a CE is not appropriate for a Forest Plan revision or for components of a Forest Plan revision. Categorical exclusions were designed for management actions without significant impacts that have broad public acceptance, such as replacing culverts for fish passage or noncommercial thinning within pine plantations. This would be an abuse of the Categorical Exclusion process.

The only reason that comes to mind for the Forest Service trying to amend the Forest Plan piecemeal during the larger Forest Plan revision process underway is to enable more logging to happen more quickly to enable meeting unsustainable doubling or tripling of the timber sale volume each year under the Trump administration. We are strongly opposed to such drastic increases in the scale, pace, and volume of logging and associated road reconstruction, prescribed burning, hazard tree logging, etc., which has resulted in a very sterile landscape.

with virtually no recreational aesthetic appeal or natural forest structural and process integrity left. Witness the disastrous results of the West Bend sale. I drove up spur roads moving away from the Deschutes River to camp without fees, as did others, and was horrified by the complete sterility of the forest, along with enormous slash piles waiting to burn intensely, which had no resemblance to the more intact (albeit plantation) forest I had field surveyed prior to the logging. I felt deeply sorry for the other people camping there, who may have come in in the dark as I did, only to be shocked by the apocalyptic trashing of the forest in the morning. They all looked grim and dejected, as I felt, and not likely to return. I won't return to that area either unless to prevent even more damage - it's too depressing. Such unsustainable logging to very low basal areas with too frequent rotations and over large scale landscapes is completely unsustainable ecologically and economically. Not only is there less economic return from logging each time, but such heavy logging destroys recreational aesthetics, natural character, and scenic values. The effects are cumulative, leading eventually to the recreational visitors abandoning the Deschutes for more beautiful and natural destinations. An EIS is needed - in the context of the full forest

Plan revision, not piecemeal amendments or CES, to adequately analyze and disclose potential longterm and cumulative environmental impacts of each proposed change ("amendment") to the existing Forest Plan when they are combined together. Such analysis needs to consider past, current and ongoing, and future impacts in their cumulative effect. This is especially critical for an entire Forest Plan revision. It is unprecedented to revise a Forest Plan piecemeal, one amendment followed by another, with only scoping and the use of Categorical Exclusions. In the case of the Deschutes, this proposed amendment follows another piecemeal amendment regarding the expansion of prescribed burning past existing visual quality limitations in the Forest Plan. Where will this end? Has the Forest Plan revision process been abandoned or not? The purpose of these proposed amendments appears to be to allow for ever more and faster-resource extraction and management by the Forest Service on public lands/Native Treaty lands with ever less consideration of public concerns, as required by NEPA.

We are strongly opposed to the steady weakening of public process and the increasing scale and pace and intensity of logging, which these amendments enable. We ask for such changes to be proposed and thoroughly ^{any}

analyzed for potential environmental impacts, including long term cumulative effects, as part of the overall Forest Plan amendment process through a Forest Plan revision EIS for the Deschutes, as required by NFMA and NEPA.

The piecemeal Forest Plan amendment process the Forest Service is using is unwarranted, becoming a trend of increasing potential environmental impacts without sufficient analysis and public disclosure of effects, contrary to the required EIS for Forest Plan revisions. In essence, these Forest Plan amendments are being used to circumvent required holistic analysis and public process in order to escalate logging and other Forest Service management beyond ecologically and economically sustainable limits. We are opposed to this piecemeal Forest Plan amendment process both due to attendant weakening of public process and due to increasingly significant cumulative effects to ecosystems, climate change, and public enjoyment and use of the forest.

Please keep us informed as to all future developments with this and any other planned Forest Plan amendment proposals.

For the Wild, Karen J. Ruth