Darren Cross, District Ranger
c/o Dean Schlichting
Willamette National Forest - McKenzie River Ranger District
57600 Highway 126
McKenzie River, OR 97413

March 16, 2020

Re: Flat Country Project - DEIS

Dear Mr. Cross and Project Team,

WildEarth Guardians respectfully submits these comments to the U.S. Forest Service (USFS) in response to the agency's Draft Environmental Impact Statement (DEIS) for the proposed 74,063 acre Flat Country Project – 4,438 acres of which will be treated. The DEIS states that the project purposes are: "to provide a sustainable supply of timber products, actively manage stands to improve stand conditions (density, diversity, and structure), increase vegetative habitat complexity and hardwood composition along streams, and sustainably manage the network of road systems in the project area" (U.S. Department of Agriculture, Forest Service, Willamette National Forest, Flat Country Project DEIS, pgs.17-19, January 2020). The project is located eight miles east of McKenzie Bridge and extends from Scott Mountain to the upper reaches of the McKenzie River. Please update the contact information on file to our new address below.

Our Values and Flat Country Project

WildEarth Guardians members and supporters enjoy a variety of outdoor experiences on public lands while also advocating for the restoration and protection of public lands and waters. The Flat Country Project area is popular for recreation activities, is a source of drinking water for the City of Eugene, and contains critical habitat for bull trout and upper Willamette River spring Chinook salmon - both listed as "threatened" under the Endangered Species Act. We would expect that the types of project activities proposed across this landscape would ensure recreation for locals and visitors alike is supported, while habitat for salmon, bull trout and other wildlife is enhanced, and that safe and clean drinking water is preserved – particularly as a changing climate makes cold, clean water sources increasingly valuable. We understand the mandate to "get the cut out", but we do not believe that this mandate should supersede the other goals and benefits of this landscape. We urge you to make project decisions that aim for the best desired conditions in the long term.

Given that others have expertise in the proposed logging components of this project, we are limiting our comments to the proposed road related actions. We know that by addressing the overly large, costly and deteriorating road system, water quality, aquatic habitat, watershed function, and recreational access can be significantly improved (if done thoughtfully).

The Flat Country Project DEIS

The Flat Country Project area includes 223 miles of roads (192.3 are USFS system roads) but only 70.3 miles are currently open to vehicle traffic. The proposed alternatives (2 and 3) for this project are similar in some respect to road management but have some differences.

Both alternatives propose 19.7 miles of road system closures and decommissioning, which helps move the forest towards one of the project purposes to "sustainably manage the network of road systems in the project area". We strongly support the USFS when making decisions to close and/or decommission roads to reduce aquatic risks, reduce impacts to wildlife and move more in-line with realistic road budgets. However, we continue to question, as we did in our previous comments, how a 10% reduction in system roads will reduce the overall financial burden in this forest? Are there opportunities that were missed yet could do more to achieve the road goals in this project area? The Willamette National Forest's Roads Investment Strategy (2015) proposed that 41.8 miles of road be analyzed for decommissioning in this area yet only 14.09 miles was "approved" for decommissioning with this project. We understand that ground-truthing can provide additional information but the rationale for the differences between 41.8 miles to 14.09 miles was not specifically outlined in the DEIS.

Nor was there any economic analysis related to the road system. A minimum road system is supposed to:

- "meet resource and other management objectives adopted in the relevant land and resource management plan";
- "meet applicable statutory and regulatory requirements";
- **"reflect long-term funding expectations";** and
- "ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance." 36 C.F.R. §212.5(b)(1).

We appreciate that the Willamette National Forest has been including road analysis in their projects and the identification of the minimum road system (MRS), but the DEIS for the Flat Country Project fails to outline how the proposed actions and MRS will reflect long-term funding expectations. We know, and have stated repeatedly in prior comments, that the USFS road maintenance budget only supports **basic** maintenance on 10-20% of the road system, which does not take into account the enormous deferred maintenance costs. We expected to see analysis in this DEIS related to the economic costs of the current road system and how the proposed minimum road system would reflect long-term funding expectations.

In addition, the DEIS missed an opportunity to outline how the proposed road activities "minimize adverse environmental impacts". 72% of the roads identified for decommissioning are already closed (according to Appendix D). We understand that fully decommissioning a road can often require treatments that reduces soil compaction, restores hydrologic connectivity and reconnects habitat, but the DEIS did not seem to provide this level of detail. Yet the problems with roads are highlighted in the document: "Roads continue to be the largest source of human-caused sedimentation in the project area" (DEIS, p. 105); "25% of the project area units proposed for treatment approached or exceeded the 20% maximum compaction allowed by the Forest Standards and Guidelines" (DEIS, p. 106); "sediment increases during harvest activities – 16-24% increase" (DEIS, p. 107) and Boulder Creek has a road density of "3.22 miles/square mile" which is far above the standard of 1 mile/square mile (DEIS, p. 106). Perhaps the proposal of closing/decommissioning 19.7 miles of system roads is in the right places to minimize adverse environmental impacts but this was not clear in the DEIS.

We also recognize that road maintenance and culvert upgrades are important activities that can help reduce environmental impacts from the road system. The difference between the alternatives proposed here is 108.2 miles of road maintenance in Alternative 2 and 56.2 miles in Alternative 3 (also 66 culverts replaced in Alt 2 versus 40 in Alt 3). Because Alternative 3 has less logging, there is less need for haul routes and then also less corresponding road maintenance. The Forest Service has a wealth of information from the Road Investment Strategy and other documents that highlight recreational access needs across the forest. Recreation is a multi-billion dollar economic engine, yet recreation access roads are often not prioritized for maintenance – leaving them vulnerable to storms and making them difficult to drive. The Flat Country Project also directs maintenance to haul roads, rather then high-volume recreation roads. Also, the DEIS implies that "road storage and decommissioning would provide fewer roads for public and administrative vehicle access for recreation, reforestation and fire access" (DEIS, p. 187). However, Appendix D shows that most of the roads proposed for decommissioning are already closed. In addition, the maps included in the DEIS indicate that most of these roads are short spurs, so how do the proposed road actions specifically benefit (with road maintenance) or harm recreation access? We understand that recreation is not a stated purpose of this project but when incorporating roads, the Forest Service has a duty to explain how key recreation access roads are maintained and how environmental impacts are minimized. The DEIS appears to focus treatments solely on haul roads, which makes it difficult to discern the differences between alternatives.

We appreciate and support the minimization of temporary roads in Alternative 3 (6.7 miles) and that consideration was made to the placement of these roads. We strongly encourage the Willamette National Forest to minimize temporary roads and implement the cautionary approaches outlined in the DEIS: small spurs, use previously disturbed areas where feasible, small yarders and small footprints, placement on gentle slopes, minimized soil disturbance, decommissioning after use and avoiding riparian reserves.

We do not support the "roadside fuel breaks" proposed in Inventoried Roadless Areas. This does not meet the goals or objectives of Inventoried Roadless Areas and we ask that this be removed from the final decision.

In conclusion, we do appreciate the effort made by staff at the Willamette National Forest to move towards a more sustainable transportation network and identify the minimum road system. The project is located in one, of many, amazing parts of the forest. Yet, threatened salmon and bull trout still struggle to recover in these rivers and streams. Local communities and visitors depend on clean drinking water that flows through this landscape. And this area is beloved by many recreational users. There is tremendous opportunity to protect and restore this landscape and we appreciate your efforts to do so.

Thank you for offering this opportunity to incorporate our input, combined with our comments at previous stages, in the next step of your analysis. As always, we are available to meet and discuss further.

Sincerely,

Marlies Wierenga
Pacific NW Conservation Manager
WildEarth Guardians