

Sept 30, 2020

OBJECTION

Deschutes National Forest
Camping and Campfires Closure Order
Holly Jewkes, Forest Supervisor, Deciding Officer

Dear Holly,

I am filing this objection to the Deschutes National Forest Camping and Campfires Forest Order Draft Decision and Finding of No Significant Impact, pursuant to 36 CFR218, subparts A and B. Specifically, I am objecting to the Forest's failure to include the Metolius Wild and Scenic River Recreation Segment within the proposed Closure Order. This would bring the Forest into compliance with the management direction of the Deschutes Forest Plan, as amended by the Record of Decision for the Metolius Wild and Scenic River (WSR) Management Plan (USDA-FS, May 27, 1997). Adding the Metolius Wild and Scenic River corridor to the Forest Closure Order also allows Forest Officers to more simply and consistently enforce federal regulations under 36 CFR 261 Subpart B. Protection of the Outstandingly Remarkable Values (ORVs) for which the Metolius was designated as a Wild and Scenic River is not only a mandate of the Deschutes Forest Plan, but of the Wild and Scenic Rivers Act itself.

I have provided detail on this issue in my letter of July 12, 2020, (attached) commenting on the Draft EA for this project. In summary, the Deschutes Forest Plan, as amended, prohibits dispersed camping within the Recreation segment of the Metolius WSR (roughly the river corridor from the headwaters to Bridge 99) except in designated sites (Metolius WSR Management Plan, Standard and Guideline MTDS-1). This prohibition has never been enforced, ostensibly because the Forest lacked a specific Closure Order that would allow Forest Officers to do so.

In response to my comments, the Forest failed to even consider an alternative that would include the Metolius WSR corridor in the Closure Order, in spite of the fact that the analysis and impacts would be no different or difficult or inconsistent with the scope of the proposal than adding a new order to the analysis for the Three Creeks Lakes Area, or modifying the proposed order during and following the scoping period to include changes to the Cascade Lakes Highway Scenic Corridor and the Whychus Creek WSR Portal Area. As noted in my comments, the Existing and Desired Future Conditions, the Decision Framework, the Issues, and the Environmental Consequences are all the same as for the other proposed actions. I am happy to draft language for the Closure Order specific to the Metolius if desired.

In the comment analysis, the Forest response to my proposal was that the Forest needed more time to inventory dispersed sites and determine which to designate and which to close and rehabilitate (Comment Consideration, page 7). Indeed, the Forest Plan as amended contains direction for how to designate sites and repair unacceptable resource damage resulting from dispersed camping. The Forest has been able to prioritize this work in over 20 years since the

adoption of the WSR Management Plan. While critical to the protection of the Outstandingly Remarkable Values, these actions are clearly outside the scope of this analysis and decision. The need for survey and inventory in no way precludes the Forest from protecting the Metolius in the interim by including the WSR corridor in the proposed closure order, which is clearly well within the scope of this proposal, is completely consistent with the stated Purpose and Need for this proposal, and is mandated by the direction in the Deschutes Forest Plan, the Metolius Wild and Scenic River Plan, and the National Wild and Scenic Rivers Act.

Please take advantage of this simple opportunity to fulfill a small portion of the Forest's responsibilities for ORV protection under the mandates of the Wild and Scenic Rivers Act, and to mitigate the failure of the Forest Service to adequately survey and monitor prohibited dispersed camping within the Metolius WSR corridor for the past 20 years.

Respectfully,

A handwritten signature in black ink, reading "Rod Bonacker". The signature is fluid and cursive, with a long horizontal stroke at the end.

ROD BONACKER

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CC: Douglas Hancock, President Friends of the Metolius
Paul Dewey, Central Oregon Landwatch

Attachment

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July 12, 2020

RE: Comments on Deschutes NF Camping and Campfires Forest Order, Draft EA June 2020.

Hello Holly,

The Forest should include the Recreation Segment of the Metolius Wild and Scenic River (WSR) Corridor in this blanket closure order. The Metolius WSR Management Plan amended the Deschutes NF Land and Resource Management Plan in May, 1997 (Metolius WSR Record of Decision, Collins May 27, 1997) and included direction to limit dispersed camping to pre-designated sites only (Issue #7) to protect the Outstandingly Remarkable Values (ORVs) of the river. This has never been adequately enforced because there has never been a closure order in place.

In 1997, dispersed camping was not a big issue in the Metolius Basin, mainly because the numerous developed campgrounds rarely reached capacity except on a few holiday weekends. There were less than 10 sites documented in the WSR analysis in 1996. The impacts, however, of dispersed camping particularly on the ORVs of water quality and riparian vegetation were well understood and addressed in the Management Plan. Obviously, with the exploding growth in visitor numbers documented in your EA, this situation has changed and dispersed camping has expanded substantially. While the Forest Service likely has little or no data on dispersed sites (in spite of monitoring that is also mandated in the WSR Plan), I have, this summer, personally observed new dispersed sites being routinely used upstream of Canyon Creek Campground on both sides of the river, between Riverside Campground and Camp Sherman, outside of Canyon Creek Campground, and at roadside pullouts along FS Road 14. Some of these sites have had active campfires as recently as last week, in spite of the recent forest order.

Already, many of these sites are exhibiting increased areas of barren soil and erosion runoff, remnants of improperly disposed trash and human waste, loss of standing live riparian vegetation, and loss of dead and down woody vegetation for illegal campfires. While I have no data beyond what I have observed over 50 years of visiting and working in the Metolius Basin, neither has the Forest Service fulfilled their all responsibilities mandated by the Wild and Scenic Rivers Act.

The Metolius WSR Management Plan addresses dispersed camping as follows:

Dispersed Camping

Dispersed camping is an incidental and non-integral use in the Recreational river segment of the corridor. It plays a role in the Scenic river segment, because dispersed camping provides an opportunity for accessing the more distant portions of the lower river. The quantity and location of dispersed camping sites are regulated to protect river resources and the lower river's primitive recreation experience.

- ◆ Dispersed camping is allowed in designated sites only. No more than 10 sites in the Recreation river segment and 20 sites in the Scenic river segment are designated. (MTDS-1)
- ◆ Designated sites are selected from areas already impacted by dispersed use. Designated sites will not be developed on previously undisturbed areas. (MTDS-2)
- ◆ Where they result in unacceptable impacts to riparian vegetation, upland vegetation, or water quality, dispersed sites are rehabilitated, rested, relocated, or closed. Unacceptable impacts are identified by devegetation beyond the designated site, loss of soil stability, or evident point source erosion and siltation. (MTDS-3)
- ◆ Fires are allowed only in designated fire rings. (MTDS-4)

Designating and posting dispersed sites was a High Priority Action item in the Management Plan (WSR 1997, page 16), along with removing fire rings and otherwise closing non-designated sites. Since no monitoring or identifying of open vs closed sites has ever been completed, technically any dispersed camping within the Recreational Segment of the Metolius WSR Corridor is inconsistent with the LRMP. The monitoring process to be used is defined on page 45 of the Management Plan.

Adding the Metolius WSR to the blanket order and evaluating in your EA should be as simple as it was to add the Cascade Lakes Highway Scenic Views Corridor and the Three Creeks Lake Area.

I have provided the Management Direction above. The Purpose and Need, the Existing and Desired Future Condition, the Decision Framework, the Issues, and Environmental Consequences are all the same as for the other areas.

Please add the Metolius Wild and Scenic River to your Dispersed Camping Closure Order.



Respectfully,

ROD BONACKER