



June 23, 2022

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By email to objections-pnw-deschutes@usda.gov
Ian Reid
District Ranger
Sisters Ranger District
Deschutes National Forest

Re: Green Ridge Landscape Restoration Project
Objections to Draft Decision Notice, May 10, 2022

Dear Mr. Reid,

Friends of the Metolius (“FOM”) submitted timely written comments regarding the Draft EA for this project and is today submitting specific objections to the Draft Decision Notice as provided in 26 CFR 218.5. FOM continues to support the general intent and purpose of the Project and believes that the Project is worthwhile and needed given the current conditions in the Project area. Further, FOM appreciates the modifications of the chosen Alternative (no. 3) made subsequent to the scoping. However, there are aspects of the Draft DN that need to be improved.

FOM therefore objects to the following aspects of the Draft DN:

A. Procedural Issues

- FOM objects on the basis that the EA does not comply with the “Council on Environmental Quality Regulations” that mandate that agencies should reduce NEPA paperwork (40 CFR 1500.4), that the document shall be “analytic rather than encyclopedic” and that the document “shall be kept concise and no longer than absolutely necessary (40CFR 1502.0)” (top of page 21 in the EA). At over 370 pages the EA is prolix. Even for a reader who is experienced at reading NEPA documents, in order to

discern the scope and particulars of the modified Alternative 3, the reader is required to wade through an inordinate quantity of materials (not even considering the appendices, maps, etc).

B. Roads

- Even after the modifications to Alternative 3 that are proposed in the Draft DN the road density in the Project area is too great and more of the roads that are scheduled to be closed need to be decommissioned at the end of the Project. Road closure does not prevent access while decommissioned roads cannot be accessed. With little regular law enforcement presence, access to closed roads is an ongoing problem that causes significant resource damage. By our calculation, open road density under the proposed modified Alternative is high, at around 3.7 road miles per square mile of land area.¹
- As noted in FOM's comments to the Draft EA, the Forest Service should use this opportunity presented to decommission rather than close roads that are designated to be closed in the EA. For example, looking at Maps 9 through 11 of the Draft EA, many, perhaps even most, of the roads that are set for closure could and should be decommissioned. This is especially true with respect to roads that are proximate to riparian areas such as Prairie Farm Creek, Six Creek, and Meadow Creek, and even for ephemeral creeks. There are a lot of neglected and degraded roads in the Project area. More road decommissioning will increase acres of forest core habitat.

C. Commercial Treatment

- The 21-inch dbh standard will be applied to Northern Spotted Owl dispersal habitat but the Draft DN is silent on what standard, if any, will be applied to treatments not categorized as dispersal habitat or plantation restoration. Because the Draft DN does not articulate what standard would apply, FOM must conclude that no standard will be implemented on the size of trees that may be removed.
- The science behind the 21-inch limit will surely be scrutinized in the current disputes regarding the East Side Screens. Abandoning that limit in this Project must be justified with specific data. The recent hullabaloo in Bend arising from cutting very large trees at Phil's Trail illustrate the importance of this standard to the public. If the Forest Service chooses to abandon the 21-inch standard in sectors of the Project it needs to be transparent about why the standard would be abandoned, what tree species would be harvested outside of the standard, the number of acres of the Project to which the non-standard would apply, the basis for not applying the 21-inch dbh standard, and by providing specific data on the volume of expected harvest (by tree species, in board feet) of trees harvested with dbh greater than 21 inches.

¹ In comparison, the target open road density under the Northwest Forest Plan is believed to be significantly lower, in the realm of 2 road miles per square mile of land area (the writer has not definitively verified this number).

- We cannot agree that the 21-inch standard is “arbitrary.” Of course, the Forest Service has authority within the confines of the 21-inch rule to deviate from it on a project level basis if a compelling case is made of the deviation. Here, not only is there no information on the metes and bounds of the scope of deviation but there is no case made for explaining why the deviation is necessary.

Although the foregoing comments are submitted as objections to the Draft DN, and should be considered as such procedurally, FOM believes that these are recommendations that, if implemented, will greatly improve the Project and public acceptance of it.

Thank you for your consideration.

Sincerely,



Douglas Hancock
President of the Board