



Juniper Group
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Bitterbrush Broads and Bros
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8 July 2025

Cameron Mitchell, Deputy District Ranger
Willamette National Forest
Middle Fork Ranger District
46375 Highway 58
Westfir, OR 97492

Regarding: Dead Mountain Project 67448, <https://www.fs.usda.gov/r06/willamette/projects/67448>

Ranger Mitchell:

The Juniper Group, Oregon Chapter Sierra Club (JG) and the Bitterbrush Broadband, Great Old Broads for Wilderness (BB), are responding together to the Willamette National Forest (WNF) request for comments on the Dead Mountain Project (67448), the Scoping letter from June 18, 2025 (Scoping).

The mission of the BB is to preserve and protect wilderness and wild lands. We give voice to the millions of Americans who want to protect their public lands and wilderness for current and future generations, we bring knowledge, leadership, and humor to the wilderness preservation movement, and we educate the public about the critical connection between healthy public lands and climate change mitigation.

The mission of the JG is:

- To explore, enjoy, and protect the wild places of the earth.
- To practice and promote the responsible use of the earth's ecosystems and resources.
- To educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives.

We are responding in the interest of fulfilling our missions, and representing our membership in Oregon and the whole of this country. We follow guidance from our national offices as well as from local users of WNF.

As Scoping requests the public address three specific areas (“Why Your Input is Requested”), we will order our comment according to those areas.

Purpose of Project

Reducing wildfire risk to communities is critical, but this project is treating areas many miles from community developments. We would prefer treatments are restricted to one mile or less from communities, this distance varying by forest type, slope, and other factors.

There is ongoing debate in the scientific literature as to whether or not treatments such as proposed in this project are effective in improving landscape fire resiliency. Such treatments take stands back to an earlier seral stage while allow stands to develop into later seral stages is more effective and better for forest resiliency, health, and vigor. We would prefer that WNF leave more land to develop into older stands.

Improving recreation by work on trails and campsites can be helpful, and are part of managing for these uses. We are concerned about habitat fragmentation and the overuse by visitors. Consideration must be given to the problems recreation users bring with them, including wildlife disturbance, illegal trails, invasive plants, and increased wildfire ignitions. Monitoring usage and abuses, and providing public education, such as signage, could appropriately be part of this project.

Forest products are only one of the ecosystem services provided by our public forests. Others include clean air and clean water. We request that the harvesting of 25 to 30 million board feet of timber be put into context of what the total annual quota of timber harvest from WNF is set at and how this works with a sustainable harvest plan for the next 100 years.

Other Information about Project Area

We have no other information to provide at this time.

Specific Concerns

While we would prefer that no commercial logging take place, we understand that this is part of what happens on our multiple use public forests. We feel logging on private lands only would provide the timber society needs and keep the timber industry running, but that is outside the power of WNF, or us, to accomplish.

We are concerned about how this project will be getting the 25 to 30 MMBF out of the forest. Using expensive helicopter logging for 27% of this indicates the harvest will be in remote areas or on slopes that are better left alone to fill other multiple use categories like clean air, clean water, hiking, backpacking, hunting, and fishing. Using skyline logging for 66% of this project indicates the harvest will be on slopes that are susceptible to soil disturbance and erosion. Removing trees also opens the slopes to wind which will drive any wildfire that does occur upslope at potentially great speed. Care must be taken to limit soil damage and damage to trees that are left.

We are always concerned about roads that are created or opened in projects like this. Even closing roads as described in Scoping leaves paths that are frequently turned into illegal user trails for OHVs and such. Roads fragment the landscape, and are paths for wind and wildfire, as well as invasive plant species. The WNF must limit road work it does and rehabilitate (return to more natural state) all roads,

leaving the minimum necessary for administrative work. (Even administrators should be able to walk to areas they need to access.)

Fuel breaks have similar problems to roads, in that they break up not only fuel but wildlife habitat and create more edge-like conditions with more growth of ground plants, and more drying from sunlight and wind.

We do not see riparian areas directly addressed in the scoping letter. Our concern is that these fragile ecological systems are easily damaged by human actions. The WNF must follow PACFISH and INFISH regulations: leave buffers around riparian areas, keep roads out of riparian areas, and minimize stream crossings.

We do appreciate the efforts outlined in Scoping to protect the natural ecosystem and forest, and to reduce the disturbance impact of all the activities in this project.

Thank you for considering our comments.

Sincerely,

/s/ Mathieu Federspiel
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