Data Submitted (UTC 11): 7/13/2020 7:00:00 AM
First name: Maret
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Organization:
Title:
Comments: Comments #2 -

Re: Deschutes Camping and Campfires Forest Order July 13, 2020

To: Holly Jewkes (Forest Supervisor)

Deschutes National Forest

c/o Sasha Fertig

Dear Holly and Sasha,

The Forest Service has an obligation and legal mandates under the Wild and Scenic Rivers Act to manage Wild and Scenic Rivers under approved Management Plans. As I discussed in my scoping response on March 10, there is an important closure action that has not been completed by the Sisters Ranger District and is referenced in the Whychus Portal Decision Notice.

https://www.fs.usda.gov/nfs/11558/www/nepa/69555_FSPLT2_055080.pdf

Pg 7. "Restoration and closure of Dispersed Camping Sites- 10 dispersed campsites on the east side of the creek would be closed and restored to reduce impacts to streamside areas and reduce vandalism. No dispersed camping would be allowed, except at Rd 900" (emphasis added)

Pg 8-9. "I have modified Alternative 2 to implement an integrated suite of direct and indirect management practices that include: a) signs that encourage hikers to stay on maintained trails, b) monitoring and closure of developing user trails as needed, 9 c) unobtrusive fencing along the margins of trails where needed, d) design of the river trail as a narrow Level 2 trail to provide more challenge and obstacles e) an aggressive information/education program to inform visitors on low impact behaviors. f) clarification that all of the area except, the Rd 900 campsite would be restricted to "day use only" to prevent vandalism and prevent the development of new dispersed camping areas." (emphasis added)

The camping closure/Day use only applies only to the Whychus Portal Project area, not the entire Whychus WSR corridor/Boundary.

This closure is a keystone part of implementing the Whychus Creek WSR Plan (2010), managing the WSR River for determined carrying capacity, protecting ORVs, and maintaining the semi-primitive ROS setting. The lower river area (which became Whychus Portal) was prioritized for immediate action to control use in the lower scenic river corridor. Because of this we completed the EA for Whychus Portal a year after the WSR plan was signed.

My March 10 response goes into more detail.

The response to my concerns in the Draft EA is dismissive and provides no data to support the conclusion.

I include the quote from the Draft EA below for ease (pg 11).

DRAFT EA.

"Prohibiting Dispersed Camping and Campfires within the Whychus Creek Wild and Scenic River Portal

One commenter requested that the Deschutes National Forest prohibit dispersed camping within the Whychus Wild and Scenic River Portal Area, except for at the National Forest System Road 900 campsite (as described in the 2011 Whychus Portal Decision Notice). Under this decision, many of the National Forest System roads in the portal area were either decommissioned or closed, 10 dispersed campsites on the east side of the creek were closed and restored, parking areas were reduced, and other project activities. This alternative was considered but eliminated from detailed study because at this time, employees on the Sisters Ranger District have not observed issues with dispersed camping in this area. (Emphasis added) Following the road closures and decommissioning, campers would need to walk into sites to dispersed camp along the creek, which has reduced dispersed camping use and resource impacts to the wild and scenic river in this area."

The Forest Service has a legal obligation to protect and enhance the Whychus Creek WSR Outstandingly remarkable values (ORV) (Hydrology, Geology, Scenery, Cultural and Prehistoric Use, Fisheries). Recreation was not found to be an ORV.

The EA response is inadequate on several accounts:

This assessment of "have not observed Issues" is based on what indicators and at what locations? Please discuss/reference the data. My Forest Service career of 25 years in Sisters taught me we often make monitoring promises we can't keep. But if that's the reality, then caution is in order, not assumptions.

Drive by visits and casual looks often do not find these problems. Monitoring is down with our local volunteers, use is high, Forest Service Field presence reduced. This may go on for a while.

There is required monitoring and methods based on the appropriate indicators for each Resource Value in the Whychus WSR Management Plan for assessing the effects/impacts of recreation.

See Whychus WSR Management Plan, Monitoring Plan Pg 63 and on.

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5363785.pdf

Assessing Impacts to ORV's

1. Assessing impacts on Waters Quality (Hydrology ORV)

Suggested methods- "Annual surveys of riparian trails and roads in the Whychus Wild and Scenic River corridor."

Has this been done?

2. Assessing impacts on Riparian vegetation. (part of Hydrology ORV)

Suggested method- "Conduct baseline riparian/wetland resource inventory and photo inventory, starting in 2010. Continue to reassess at 5- year intervals. If funding is limited, at a minimum identify areas of resource damage. Visually monitor recreation and other sites annually for resource damage. If funding allows, establish formal monitoring plots in high use areas." Has this been done?

3. Assessing impacts on Fish habitat (Fish- ORV)

Suggested method- "Regular survey of riparian trails and roads in the Whychus Wild and Scenic River corridor."

Has this been done?

d. Assessing impact on Cultural Resources (Prehistoric and traditional USE ORV)

Suggested method- "Visit sensitive sites at least annually".

There is a completed signed closure order on Whychus House Cave that was not included in your Draft EA as well. Has this site been monitored as well as other important sites along the creek? Why was the Whychus House Cave closure order not included?

e. Recreation experience (Important monitoring on Limits of use are found here)

Suggested method- "Conduct LAC survey and develop monitoring program, repeat every ten years. First survey should be in 2010/11."

I know the first round on this was completed while I was finishing the Whychus Portal Project as implementation lead before I retired. The second round is due. Is it scheduled or completed? If so, what does it show?

"Inventory and assess all existing and proposed sites within the river corridors upon approval of this plan. Remeasure and assess all sites once every three years, or when conditions indicate need. Utilize feedback from routine patrols and biological/wildlife monitoring programs." Was this done?

Conclusion:

Please include Closure orders for Whychus Portal to implement the Whychus Creek WSR Management Plan. These actions have been approved through NEPA and on the TO DO list since 2010. Note that the Whychus House Cave Order was completed and should be in closure order records from early 2010,11 .

Use of monitoring indicators and methods that address resource conditions would allow an informed approach on whether dispersed camping is occurring off the beaten path and having impacts. Dispersed camping is not allowed in the Whychus Portal Project Area. Is current management is meeting the "protect and enhance" standard for ORV's? If you pull together Use data from Sisters Trails Alliance or other sources you will find we are often exceeding desired levels of use and dispersed camping is the next frontier as the interest in nature grows with growing population.

Please supply any of the monitoring that supports the statement in the EA or address how this issue will be addressed in the future. I am willing to help as a volunteer. We need to work together as a community to protect the creek and that was part of the WSR Plan as well. This is an opportunity for the Forest Service to work on its "WSR Do-To List" while there is still time to prevent damaging actions from occurring unnoticed and unmonitored.

Sincerely, Maret Pajutee, mpajutee@gmail.com

Cc:

Ian Reid, Sara Baughman, Lisa Machnick, Sommer Moyer , Michael Keown

Bill Anthony, STA, Paul Dewey, Doug Hancock, Lorie Hancock