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First name: Douglas
Last name: Hancock
Organization: Friends of the Metolius
Title: President of the Board
Comments: By email to comments-pacificnorthwest-deschutes@usda.gov

Holly Jewkes

Forest Supervisor

Deschutes National Forest

Re: Deschutes NF Camping and Campfires Forest Order, Draft EA June 2020

Dear Ms. Jewkes,

I am writing on behalf of Friends of the Metolius ("FOM") to request that the recreation segment of the Metolius Wild and Scenic River corridor be included in the closure order referenced above. As you know, the Metolius basin is one of the most valued and spectacular ecosystems in Oregon. FOM is a conservation group that has been an ardent supporter of protecting the Metolius Basin for over thirty years. Our organization's mission is limited solely to protecting the legacy and natural resources of the Metolius Basin. Inclusion of the recreation segment of the Metolius is an easy addition and will help to protect the corridor from existing and ongoing damage from dispersed camping.

Most of the directors on the FOM board live in the Metolius basin or are frequent visitors and each of us observe the area closely and keenly. Although we have no hard data on dispersed campsites, anecdotally, the numbers have increased dramatically this year. We are aware of numerous dispersed sites that are being used regularly and of recently created dispersed campsites, and we have received comments from our members about other dispersed sites. Over the past couple of weeks, members of our organization have monitored dispersed campsites with active campfires at numerous locations, including Canyon Creek, upstream of lower bridge (west side), upstream of Camp Sherman, and several others. The increases in dispersed camping in these areas has already resulted in areas of barren soil and erosion runoff, improperly disposed trash and human waste, loss of standing live riparian vegetation, and loss of dead and down woody vegetation for illegal campfires. A few weekends ago, concerned about the rapid increasing numbers of dispersed campers and worried about the associated environmental degradation, the Black Butte School sponsored a competition to spur people to clean and pick up trash left by campers in dispersed campsites. I understand that the school collected over 600 lbs of trash alone.

The exponential growth in the number of visitors to the Metolius WSR is causing degradation of the ORVs that the Metolius has, including water quality, riparian vegetation and habitat. The Metolius WSR management plan addressed dispersed camping and designating and posting dispersed sites was a High Priority Action in the plan, in addition to removing fire rings and closing non-designated sites. To my knowledge, there has been no monitoring or identification of open or closed sites.

Ironically, while the Metolius Wild and Scenic River Management Plan is used as a reference in the Draft EA, the Metolius is conspicuously absent from the order itself. This seems to us to be an omission. Because adding the Metolius WSR to the draft EA can easily be done, for the reasons noted, we respectfully request that you consider the addition.

Sincerely,

Douglas Hancock

President of the Board