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First name: Paul
Last name: Dewey
Organization: Central Oregon LandWatch
Title: Senior Advisor
Comments: July 15, 2020

Ms. Holly Jewkes

Deschutes National Forest

c/o Sasha Fertig

Re: Camping and Campfires Forest Order Draft Environmental Assessment

Dear Ms. Jewkes and Fertig:

I am writing to provide comments on the "Camping and Campfires Forest Order Draft Environmental Assessment" ("Forest Order Draft EA").

Central Oregon LandWatch ("COLW") is a conservation organization based in Bend, Oregon, with over 300 supporters. Now in its 35th year, COLW has a long history in participation and comment on activities on national forest lands. We were instrumental in providing support for the designation of Whychus Creek as a Wild and Scenic River in the 1980s.

We recognize, as pointed out in the Forest Order Draft EA, that there are growing negative impacts on sensitive places in the Forest where there has been excessive recreation use, including dispersed camping.

One of the areas addressed in the Forest Order Draft EA is the "Whychus Creek Riparian Corridor," defined as "between the designated Wild and Scenic River corridor and the City of Sisters." (p. 3) While that area is sensitive, even more so is the Whychus Portal Area within the Wild and Scenic River corridor that directly connects to and is on the south boundary of the "Whychus Creek Riparian Corridor" addressed by the Forest Order Draft EA.

We wish to reiterate and support the comments already submitted by the former Forest Service employee, Maret Pajutee, in support of adding this area to Forest Order Draft EA to implement the direction in the August 1, 2011, "Whychus Portal Environmental Assessment Decision Notice, Finding of No Significant Impact, and Response to Public Comments" ("Portal EA Decision"), incorporated herein by reference.

The Forest Order Draft EA disregards Ms. Pajutee's request based on its conclusion that:

"[A]t this time, employees on the Sisters Ranger District have not observed issues with dispersed camping in this area. Following the road closures and decommissioning, campers would need to walk into sites to disperse camp along the creek, which has reduced dispersed camping use and resource impacts to the wild scenic river in this area." (Emphasis added.) (p. 11)

This conclusion is without merit where it not only relies on an undocumented assessment, but is also frankly irrelevant to the requirements of the Portal EA Decision. The Forest Order Draft EA presumes that the Portal EA Decision was implemented because "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 [sic]." (p. 11)

The Forest Order Draft EA utilizes an incorrect standard. The objective of the Portal EA Decision was not just to "reduce" dispersed camping use (except at Road 900). The Portal EA Decision states:

"No dispersed camping would be allowed." (Emphasis added.) (p. 7)

The "Modified Alternative 2" decision that was adopted in the Portal EA Decision emphasized in italics that it would "prevent the development of new dispersed camping areas." (p. 9) "Reduction" is not the standard. It is "No" dispersed camping that is the standard.

The Portal EA Decision further calls for active monitoring to implement its direction. Not only is there no evidence that such monitoring has been done, but the Forest Order Draft EA seems to be the perfect opportunity for implementing the Portal EA Decision direction. The opportunity presented by the Forest Order Draft EA should be taken to implement the Portal EA Decision.

As is clear from the Portal EA Decision, COLW had a number of serious concerns about the extent of recreation use that was being allowed in the Portal Area. The only reason why we did not appeal that decision is the Forest Service's commitments to banning dispersed sites (except at Road 900) and to do active monitoring. We appreciate that Ms. Pajutee, who was deeply involved in that 2011 process, is seeking to have implemented the commitments that were made then.

Thank you for this opportunity to comment and please notify us in writing of any decisions on this matter.

Very truly yours,

/s/ Paul Dewey

Paul Dewey

Senior Adviser