



March 26, 2010

Dear Forest Supervisor Dils,

Please accept these as Oregon Wild's comments on the Working Alternative to the D-Bug Timber Sale. Oregon Wild represents over 8,000 members and supporters in our mission to protect Oregon's wildlands, wildlife, and waters as an enduring legacy for all. The D-Bug project area represents one of Oregon's most precious landscapes. It extends 16 miles from the boundary of Crater Lake National Park to the northern reaches of Lemolo Lake. East to West it extends 8 miles from within the Mt. Bailey Roadless Area to the edge of the Oregon Cascades Recreation Area and the shadow of Mt. Thielsen. The original project was incongruous with the laudable goal of protecting homes and human life near Diamond and Lemolo Lakes. It understandably generated controversy on a national level. The project generated a depth and breadth of public concern appropriate to the scale of the project.

By choosing the most egregious alternative as the preferred alternative, the flames of conflict and confrontation were only further fanned. The project seemed destined for gridlock and inaction. Based on overwhelming public and administrative concerns, you developed a new working alternative and empowered your employees to embark on a collaborative process.

To facilitate that effort, on March 8th, we and 15 other groups (The Mazamas signed on earlier this week) finalized and submitted a Citizen's Alternative that identified thousands of acres of common ground, areas where agreement could be found, and areas of inappropriate activities. The language of that proposal remains germane to the Working Alternative.

The current Working Alternative is a considerable improvement from preferred alternative 4. It represents an overdue and appropriate, but marginal, step forward by the Forest Service. The March 19th meeting was a similarly significant and positive step. In the spirit of collaboration that we hope Umpqua National Forest will now embrace, our new Citizen's Alternative Proposal represents significant concessions from Oregon Wild. It is a leap of faith and act of trust that we hope we will not come to regret.

After attending the public meeting on March 19th, and further reviewing the Working Alternative, we are hopeful that we will be able to find even more common ground. We believe the materials below confirm as much. However, to truly address the most serious concerns of the public, the Forest Service needs to make further change as described below. Significant parts of the project remain controversial and present stumbling blocks towards implementation of the project – especially in unroaded and backcountry areas where logging is not necessary to protect structures or escape routes.

As the previous Forest Supervisor stated in a recent op/ed, the Umpqua National Forest has suffered from decades of mismanagement. Continued over-reliance on logging, road-building, and fire suppression may satisfy an appetite for active management. However, it only exacerbates the problem the D-Bug Timber Sale claims to address. We must reiterate that the Umpqua National Forest needs to develop and implement an appropriate wildfire use plan as soon as possible.

It was clear at the meeting that there is a strong desire for much of this project to go forward. In our Citizen's proposal, we identified 3,800 acres of common ground, and the general guidelines of that proposal still apply to this and future analyses. Based upon our initial analysis of the Working Alternative, we have identified 5,100 acres and 53 miles of roadside treatments upon which we generally have common ground. We identified 1,260 acres of treatments we may not be able to support, but to which we may not raise objections if our primary concerns are met. We also flag 2,960 acres of treatments and 5.3 miles of road that remain highly problematic and are likely to stand in the way of a mutually agreeable project moving forward.

Our analysis is based in large part on discussions with other stakeholders, however, they should not be construed as representing anyone - including the 15 other signers to the Citizen's Alternative Proposal - other than Oregon Wild. Additionally, because the meeting and materials with which we have been provided are superficial, and we have had to work within a very limited time frame, we reserve the right to change our analysis and raise additional concerns based on new information or legal requirements.

We wish to see a project go forward that appropriately protects human life and property. Though an improvement from earlier iterations of the project, the current Working Alternative still crosses clear lines and unnecessarily enters areas we consider inviolate – in particular commercial logging in Inventoried Roadless Areas, logging and roadbuilding in potential Wilderness and the “roadless triangle” adjacent to Crater Lake National Park. To the extent the Forest Service focuses on areas of agreement and decouples them from areas of disagreement, we can support the project.

Please review, as part of these comments, the Citizen's Alternative. The common ground we have identified in this analysis and the descriptions from our earlier proposal would allow for a significant and responsible project. Continued insistence to push for treatments that exceed need will only lead to continued gridlock, controversy, and wasted resources. We hope the comments contained here are clear. If you have questions, concerns, or need any clarifications, please contact us and empower your employees to do the same. We would much rather discuss issues *before* an FEIS is issued and our ability to guide the project through further collaboration is greatly reduced

Below, please find our analysis of the Working Alternative (as presented at the public meeting on March 19th) working from North to South.

Lemolo Lake WUI & units North of Highway 138:

The Lemolo Lake WUI is an extremely large area within which the Lemolo Lake Resort is the only inhabited development. Some industrial infrastructure also exists in the area. We were pleased to see the removal of the unnecessary redundant fuel break along the roads framing the Thirsty Creek Roadless Area, and the elimination of the overstory removal prescription. However, thirty-five acres of logging remain in the Thirsty Creek IRA and proposed Wilderness, significant acreage has been added, commercial logging units remain, and the Forest Service continues to insist that closing the roads framing the Thirsty Creek IRA is out of the scope of this project.

WUI - We strongly urge you to work closely with *both* owners of the Lemolo Lake Resort to appropriately balance the aesthetic and recreational values of the area with fire safety. They have indicated an interest in doing some of the hand thinning themselves. If this is appropriate and legal, it could be beneficial to all stakeholders including taxpayers. We echo the concerns of the lodge owners about specific prescriptions in the area, as well as the need for some particular units. In particular, the resort owners should be satisfied that units 160, 161, 162, 198, 176, 178, & 179 and those directly adjacent to the property are appropriate and needed. The reconstruction of roads may be particularly problematic for the desires of the lodge owners as their effects will linger even if decommissioned. Additionally, some of the isolated units east of the lake seem unnecessary.

Thirsty Creek IRA logging – based upon the prescriptions as they were presented to us at the meeting, we do not necessarily support, but are willing to let go of our objections to this. However, other groups may object, and the area should be treated with particular care.

Roads framing Thirsty Creek IRA – These roads to nowhere add a significant fire risk to the area. Since they are potential ignition sources, decommissioning them is fully within the scope of the Dbug Hazard Reduction Timber Sale. Additionally, doing so would be a gesture of good faith that could help assuage concerns related to other parts of the project. We enthusiastically support their conversion into hiking and skiing trails. Parts of units 195 and 141 should be left out of the project as they are *de facto* roadless areas, part of a Wilderness proposal, and far enough removed that their inclusion would have very small marginal effects in reducing fire risk.

Road construction, reconstruction, and decommissioning – In these areas *and throughout the project*, road decommissioning must be included in the analysis and accounted for coequally with construction and reconstruction. Temporary roads have real costs and permanent effects. Here and throughout the project area we encourage the Forest Service to reassess the need for roads. To the extent the need for roads can be negated or minimized by dropping or scaling back units and prescriptions without causing a measurable decrease in fire safety, the Forest Service should do so.

Highway 138

This section describes our concerns regarding units near highway 138 and included in the North D-Bug Working Alternative Map.

We were pleased to see the modest and appropriate pull back out of the Northern portion of the Mt. Bailey IRA. Unit 300 was added to “tie-in and strengthen” the egress route. This area includes significant commercial logging and areas far from either WUI. For the most part our assessment of the units in this area will be an assessment of their compliance with the guidelines of the Citizens’ Alternative Proposal, and how they fit into the context of the rest of the project.

Unit 118 – Until unit 300 was added in, this unit was isolated and distant. It still seems extraneous and far too large. Commercially logging an area up to 1 mile wide in places to protect an egress route is excessive. This is especially true when taking into account the amount of road construction and reconstruction this unit requires. Serious concerns regarding impact on wildlife habitat exist here as well. We are sensitive to both the size and prescriptions for this unit. For us to support the project, this unit should be scaled back in size, and we would be much more likely to support appropriate thinning from below.

Unit 300 – The degree to which we feel the unit was added to “tie-in” unit 365, we strongly object. To the degree it “strengthens” the safety of the egress route, we support it. Future analysis of the FEIS will shed light on this, and we will look closely at the unit with particular attention to riparian concerns.

Unit 115 – This area is part of a *de facto* roadless area. It includes important wildlife habitat and forms the northern edge of our wilderness proposal. We find aggressive prescriptions and significant roadbuilding in the area to be very troublesome. We urge you to scale back the unit to what can be treated from the current roadway.

Units along 138 as it turns south – We appreciate the dropping of acreage in the OCRA, and proposed Wilderness areas. While we would prefer less aggressive logging in this area, so long as prescriptions demonstrably match and do not egregiously exceed need, we will likely not object to the project on these grounds. To the extent possible, please minimize road-building and aggressive prescriptions.

Highway 138 & South to Diamond Lake

We appreciate the modest scaling back of the project to stay out of the Mt. Bailey IRA. We trust any bleeding over of roadbuilding and logging on the Working Alternative map is a function of poor printing and does not represent any incursions into the area. So long as they do not violate the concerns we have already expressed, we do not object to appropriate new expansions near the outlet as described in the presentation. We appreciate the modest pull back from the OCRA. Though we may not be supportive of all of the activities in this area, as an act of good faith we will likely not object to the project based upon these units but we again urge the Forest service to minimize road-building and overly-aggressive prescriptions to the extent possible.

Diamond Lake Area

This area contains significant infrastructure and should be the focus of the project. It also contains some of the more sensitive units. The project removed 17 acres of OCRA logging but also added areas of logging to “fill in gaps”.

North end of Diamond Lake – See notes above. We hope to see some scaling back of road-building and prescriptions in the area, but we will likely not oppose the project based upon these concerns. We urge that the prescriptions between the loop road and the lake be very light on the land, focus on surface and ladder fuels, and retain the existing dominant and co-dominant canopy.

East Shore – This has been and generally remains an area of common ground. Continue to work with the lodge owner and user groups, and minimize visual impacts for recreation users.

South Shore – We have not fully assessed the new logging in the area, but generally do not object so long as it does not unnecessarily damage riparian, wildlife, recreation, or other values.

Remote Western units – We were pleased that the Forest Service recognized the lack of need for these units and removed them from the project.

West shore – We strongly support appropriate thinning between the loop road and the lake to create defensible spaces around the homes on the West shore. We trust the Forest Service will work closely with homeowners/lessees to design and carry out appropriate prescriptions.

Mt. Bailey Inventoried Roadless Area adjacent to Loop Road – The Roadless Rule is a balanced one that *does* allow for appropriate exceptions so long as those activities also enhance roadless values. The Forest Service can best meet the objective here by conducting non-commercial vegetation management. Commercial logging in Inventoried Roadless Areas is inappropriate and violates both the spirit and letter of the 2001 Roadless Area Conservation Rule. While we will not support a project that commercially logs Inventoried Roadless Areas, we will not object to appropriate non-commercial thinning that satisfies the need to address a demonstrable threat to human life.

We would prefer no logging take place beyond the paved bike path and are not convinced it is entirely necessary. However, if *all* prescriptions within the Mt. Bailey IRA are changed to non-commercial fuels reduction, and all areas beyond the paved bike path are hand-thinned per the verbal description we received (targeting trees 7” and less in diameter), we will not object to non-commercial activities above the bike path as currently mapped on the Working Alternative.

Instead of relying on a cookie cutter distance-from-the-road calculation, we urge the Forest Service to reassess where roadless logging could be scaled back based on topographical conditions. We also urge the Forest Service to recognize the major social and political consequences this decision entails. Since the 2001 Roadless Area Conservation Rule was enacted, only 535 acres of forests have been logged in inventoried Roadless Areas around the entire country. As shown in the current Working Alternative, this project would entail 420 acres of IRA logging. It is a major, but appropriate concession to allow a project that protects homes and human life. We expect the Forest Service will not betray the trust that concession represents.

Crater Lake Roadless Triangle Units – This area represents one of the last major points of contention between the Forest Service’s Working Alternative and the Citizen’s proposal. Such aggressive logging in this area is controversial and could unnecessarily stop this project. We strongly urge the Forest Service to uphold the spirit of collaboration and allow the widely supported parts of the project to go forward while decoupling unneeded, wasteful, and destructive units from the project. Though not protected by the 2001 Roadless Rule, these areas are *de facto* roadless areas. As part of a roadless area that is tens of thousands of acres in size, “the triangle” was excluded from the roadless inventory based on bureaucratic technicalities rather than any meaningful ecological distinction. They also represent critical habitat for imperiled species and abut Crater Lake National Park.

We note that the paved highway abutting the triangle already enjoys very generous fuel breaks and we can support modest efforts to enhance the effectiveness of the existing fuel break while protecting the *de facto* roadless area. We do not object to the significant logging to the north of Highway 230. Additionally, we are willing to drop objections to logging between the Highway and the trail/old road paralleling it to the south as well as thinning *along* that trail/road. We also support thinning along highway 138. However, we strongly object to the major logging and roadbuilding scheme shown on the Working Alternative map that takes place to the East of the highway south to the boundary of Crater Lake National Park. The buffer between the thinning we support is sufficient to protect the infrastructure and egress routes along the south shore of Diamond Lake (some of which takes place as far as 4 miles away).

Wildfire Use Plan

Unlike other National Forests in Oregon, the Umpqua National Forest does not have a wildfire use plan. The DBug Timber Sale continues to be justified as an effort to create defensible space and safe egress routes around the Diamond and Lemolo Lake areas so when the inevitable wildfire comes through the area, human life and property will be protected. Until the Umpqua National Forest develops a wildfire use plan, this is an effort in futility. The Forest Service will continue to waste resources “successfully” or futilely suppressing fires in the backcountry, fighting fires in Wilderness areas, developing projects such as the DBug Timber Sale, fighting with non-timber interests, and hastily reacting to or exploiting emergencies.

We will support a project that:

- Appropriately protects homes and human life from natural processes like wildfire
- Maintains environmental, aesthetic, and recreational values
- Is fiscally, socially, and environmentally responsible
- Utilizes the best available science
- Comes out of a meaningful collaborative process
- Reintroduces natural processes and reduces the need for unsustainable long-term active management in the backcountry
- Complies with the letter and spirit of all relevant laws, rules, and regulations

We will object to this project if it includes:

- Commercial logging in Inventoried Roadless Areas
- Continued insistence on overly aggressive logging and roadbuilding in Units 42, 65, 67, 68, 69, 71, 72, 73, 115, 118, 213, or 214
- Logging or roadbuilding that is objectionable to the Lemolo Lake or Diamond Lake Resort owners
- Violations of current rules, regulations, and laws

We strongly encourage the Forest Service to:

- Close, as dangerous ignition sources, the roads to nowhere that frame the Thirsty Creek Roadless Area
- Work with cabin owners to balance aesthetic concerns with fire safety
- Reassess ways to reduce the size of or eliminate unit or scale back prescriptions to minimize the need for road building
- Minimize or avoid logging and roadbuilding in *de facto* roadless areas and Wilderness proposals
- Develop a wildfire use plan for the Umpqua National Forest
- Embark on a meaningfully collaborative process on future projects to avoid unnecessary conflict that wastes time and resources of all stakeholders and only serves to destroy trust and produce gridlock

Thank you for considering our comments.

Very Sincerely,

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