

# Suggested Talking Points for Public Comment

*(Expanded Background and Context)*

11/15/2021

## **Related to treatments in Northern Spotted Owl (NSO) habitat:**

All Green Ridge Project Forest Service alternatives propose logging in Northern Spotted Owl (NSO) dispersal habitat. This should be significantly reduced or altogether excluded.

The Spotted Owl is a precious species in our forests, and we remain dedicated to its revival and protecting its habitat. While we appreciate the Project's dedication to safeguarding nesting, roosting, and foraging sites, the proposed treatments in the owl's dispersal habitat are of great concern, as protected dispersal habitat is an essential piece of the resiliency of the Northern Spotted Owl. We continue to see the importance of protecting this species and its home by the recent rollback of Trump Administration Northern Spotted Owl habitat removals-- nearly [3.2 million acres](#) of critical habitat are rejoined as protected spaces. We want to continue this trend and the good work the Forest Service has done in creating and maintaining protected areas for Northern Spotted Owl. So we hope to see treatments in dispersal habitat removed from the Project.

### **Action**

Ask the Forest Service to keep logging projects out of the Northern Spotted Owl dispersal habitat! Ask that all Northern Spotted Owl dispersal habitat areas be dropped from the Project.

Additionally, Douglas Firs and White Firs are important habitat for owls. Thinning these trees has a major negative impact on the Northern Spotted Owl. Ask that more fir trees be left in place to provide important habitat so we don't lose this species forever.

## **Related to treatments in Late Successional Reserves (LSR):**

The Northwest Forest Plan created Late Successional Reserve (LSR) areas in recognition of the inherent value of protecting late-successional and old-growth forest ecosystems, in addition to defending the critical habitat for endangered and sensitive species, such as the NSO, these forest structures provide. The Forest Service itself highly discourages logging in these areas under most circumstances, and this Project should not be an exception.

## Action

Ask the Forest Service to stay out of Late Successional Reserve areas. These areas of the forest are on their way to becoming old-growth forests, also called “late-successional” forests. Oregon has lost so many old-growth forests in the past. We need to protect our future old-growth forests now!

If some thinning does *need to happen* in these areas, we ask for a specific and precise commitment to leave all old-growth trees untouched and specify a certain diameter of trees to protect. (Essentially, any tree over a certain age and diameter should be off the table for direct thinning and commercial logging.)

## Related to mule deer habitat:

This proposed project area includes treatments in critical habitat areas for mule deer. This Project is in their winter and summer range in a place where vegetation coverage for warmth, hiding cover, and forage is key. Our mule deer populations are declining year over year, and leaving the bare minimum of tree protection in a restoration project isn't enough.

The Project should not amend the Forest Plan to reduce hiding coverage below 30% in mule deer summer range. This percentage of coverage was established as a bare minimum to protect the deer, and reducing this number even further could have devastating impacts on an already suffering species. The Metolius herd has declined by [40% in recent years](#). Additionally, treatments should not be conducted on precious winter range and the overall connectivity for migration and summer and winter range.

## Action

Ask that the Forest Service maintain at least 30% tree coverage for mule deer in the MA-7 summer range. (What is MA-7? It's a land allocation that refers to forested habitat areas with specific tree coverage standards under the Deschutes National Forest Land and Resource Management Plan.) We ask the Forest Service to preserve as much thermal and hiding cover as possible in summer and winter range areas. Locations of cover should also be coordinated to provide comprehensive migration and range coverage in the project area.

## Related to Wildlife Retention Clumps:

Wildlife Retention Clumps are areas that are set aside in logging projects to keep some wildlife habitat. We need to see more areas protected for wildlife in this

project! Right now, they've only set aside 5-15% of each logging unit for wildlife retention clumps.

The Forest Service needs a concrete, specific plan for wildlife retention clumps that goes far beyond the 5-15% currently proposed for each unit. Such small coverage percentages, scattered across many units, do not guarantee cohesive wildlife habitat and/or coverage. The Project area provides crucial migration, winter and summer range for mule deer, in addition to providing important habitat for many other sensitive species, including sensitive wildlife management indicator species. As a result, a commitment to much greater than the bottom 5% of unit retention and a cohesive landscape-level design should be introduced to demonstrate how and where the promised connectivity is actually achieved.

### **Action**

Ask the Forest Service to commit to setting aside a specific percentage for Wildlife Retention Clumps. It should be far greater and more precise than 5-15%. In addition, the Forest Service needs to create and share a plan that shows how these Wildlife Retention Clumps connect to each other, so wildlife can move and migrate as needed.

## **Related to decommissioning roads:**

The current project proposal would increase the number of roads built in the forest. While these temporary logging roads are typically "closed" at the end of the Project, they are often still accessible, leading to a long-term increase in vehicular traffic that severely disrupts wildlife habitat areas.

The fewer roads we have in our forests, the better. In Alternative Four, the Sisters Ranger District commits to closing 27.5 miles of road and decommissioning an additional 25.5 miles. While this is a significant improvement from its original proposal, and we are thrilled to see roads decommissioned, it does not go far enough. Roads disrupt the landscape and impact the safe movement and other lifecycle traits of many wildlife species in the Project area, including the struggling mule deer. Further, Forest Service roads that are closed but not decommissioned have led to increased, harmful instances of poaching on our public lands.

### **Action**

To respond to this increased disruption, ask the Forest Service to decommission more roads and make them impassable. It's not enough to "close" the roads on the map, but not on the ground, after project use.

## Related to commercial logging:

This Project is billed as a “restoration project.” If that is true, the forest shouldn’t be sold for profit.

The forest service needs to better articulate the Project areas where commercial logging is occurring. It should impose a size limit on the trees that can be harvested for commercial purposes. The forest service recognizes that even the Matrix, the name for the area with a green light for commercial logging, hosts important connectivity between protected forest areas and still provides important habitat for wildlife that relies on both younger and older forests. In a project aimed at landscape restoration, we should not see any commercial logging—especially in a Project area so severely damaged from previous clearcutting and heavy logging.

### Action

This Project is billed as a “restoration project.” If that is true, the forest shouldn’t be sold for profit. Ask the Forest Service to remove all commercial logging from this Project.

If commercial logging *must* occur, we have the right to know why, where, and what trees. The Forest Service should explain the reasoning, provide exact project locations, and impose a maximum limit on the size of trees logged: no trees larger than 21” in diameter should be cut.

## Related to carbon storage and climate change:

We know that the oldest and biggest trees in Oregon’s forests work as carbon sinks when they’re left standing. Removing trees releases that carbon into the atmosphere.

The Project proposes a timber harvest and prescribed burn of 10,000 to 18,000 acres of Deschutes National Forest. This type of logging and burning needs a better analysis of the impacts on carbon release and climate change. *Maybe this is where we do a breakout about trees, carbon storage, and deforestation/ carbon release?* In the PNW, we feel the escalating impacts of climate change with each passing season, and we need to start making decisions with our warming planet in mind. While the Sisters Ranger District proposes logging and prescribed burns to reduce fire risk, a better overall understanding of the carbon released from these projects, which lead to climate patterns that cause more catastrophic fires in the first place, must also receive adequate study and attention. In its EA, the main analysis of these impacts states: “This proposed project affects a relatively small amount of forest land and carbon on the

Deschutes National Forest and might temporarily contribute an extremely small quantity of greenhouse gas emissions relative to national and global emissions.” (EA 333).

We can no longer afford a measuring stick of who did it worse—every contribution to these emissions matters, which further supports removing any commercial timber units from this restoration project, to reduce the overall carbon release to just the necessary restorative thinning.

**Action**

For this Project and ongoing projects, ask the Forest Service to conduct a more thorough analysis on the amount of carbon released from the proposed treatment acreage.

**Related to disclosure of environmental effects:**

**Action**

The Forest Service only did an “Environmental Assessment” of the Project. Request a full “Environmental Impact Statement” that analyzes and discloses the full environmental impacts of the project.