January 11, 2013

Via hand delivery and electronic mail

Kevin Larkin, District Ranger
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Dear Ranger Larkin,

Thank you for the opportunity to submit comments on the Sunriver to Lava Lands Paved Path (SRLLP) Environmental Assessment (EA). On behalf of the Juniper Group of the Oregon Chapter of the Sierra Club, I would like to make the following comments on the project:

1. Purpose and Need – The stated need for this project is not supported by any data. The EA claims that the need for a new paved trail connecting Lava Lands Visitor Center and Sunriver “has been expressed and supported by local residents and the neighboring community,” yet there is no indication that the Forest Service has done any visitor use studies or surveys to determine whether such a trail would be utilized enough to warrant its construction. There are already over 35 miles of paved bike trails accessible from the community of Sunriver. The proposed 6-miles of paved trail has significant environmental impacts and it is necessary for the Forest Service to adequately research and investigate what the actual visitor usage would be and whether the benefits outweigh these impacts. This data could easily be gathered by surveying Sunriver residents and visitors to the Visitor Center. If it has already been collected, it should be presented clearly in the EA.

Additionally the expressed purpose of this project is “to provide for existing outdoor recreation use levels on public lands by creating a safe route for bicyclists and pedestrians to travel from the community of Sunriver to Lava Lands Visitor Center and the Deschutes River trail and recreation sites.” This purpose fails to account for the fact that there already are several safe pedestrian and bicycle routes from Sunriver to Deschutes River trail and recreation sites, including the Benham Falls loop and the Black Rock trail, which are accessible by mountain bike and by foot. The Forest Service should justify with data the need for an additional paved trail connecting these particular sites.

2. Soil Impacts - The description of soils and potential impacts to soils presented in the EA is inconsistent and confusing. The mazama ash soils in the area of the trail are described as both “moderately deep” and then in the next paragraph “relatively thin topsoil.” (EA, p.93). The analysis goes on to say that the soils are not considered to be sensitive but that they are slow to recover. (EA, p.93). The analysis of cumulative impacts describes intense disturbances on these soils, including logging and fire, and yet
concludes that, “the expanded area proposed for development of the paved path and parking site is comparatively small within the vicinity, and amounts to an additional seven acres being converted and maintained for a non-forest use, a relatively negligible amount of land within the surrounding area that is dominated by a productive forest.” (EA, p. 93). This statement misrepresents the potential impacts to the soil and, arguably, is meant to intentionally downplay these impacts. Obviously comparing 7 acres of paved area is small when put in the context of “the vicinity,” which presumably refers to the rest of the entire Deschutes National Forest (although the definition of “the vicinity” is not specified). A tiny paper cut on your hand has a negligible impact on your overall health but hundreds or thousands of cuts will do damage. The reality is that building a 6-mile paved trail will not have a “negligible” impact on the soils over those 6 miles, and cumulatively the paved area will further damage the soils in an already very impacted area. The EA should acknowledge the reality of these impacts rather than trying to couch them in verbiage.

3. Elk Impacts – Elk is management indicator species (MIS) for the Deschutes National Forest. The EA acknowledges that the project is located with the Ryan Ranch Key Elk Area, a management area designated in the Deschutes National Forest Land and Resource Management Plan (LRMP). Land management planning within elk management areas is “designed to provide conditions needed to support summering and wintering elk.” (EA, p. 5). The EA acknowledges that within the project area, elk thermal cover is at 21%, hiding cover is at 16% and road density is at 2.77 miles per square mile, numbers which are significantly lower than the Forest Plan Standards and Guides for Elk. (EA, p. 70). These low numbers are attributed to increased human impacts resulting from the growth of the Sunriver community. The EA goes on to say that project activities would not further reduce cover. This statement is unjustified and without support. The paved path, especially in segment 8, will disrupt and alter the migration corridors and eliminate hiding cover for elk. Over 200 trees, which are what make up the cover for the elk, will be removed to create a 50-foot wide corridor extending for 6 miles. The corridor will increase fragmentation of this already heavily impacted area. A cumulative impacts analysis should have been done to assess whether this fragmentation of migration corridors, in addition to other activities on the forest and in this management unit, will have an impact on the viability of elk populations within the forest.

Clearly the underlying theme of the EA’s analysis of elk impacts is that this area is a lost cause as far as elk habitat, and that continuing to eliminate cover is not important or significant because the area is so heavily impacted already. This attitude, however, is irresponsible and ignores NFMA regulations and Forest Plan direction regarding MIS. The Service cannot just write off the management indications for a particular area, in this case a Key Elk Area, because they have already allowed significant impacts to the area. Additional degradation of cover and habitat corridors will have a negative impact and this impact should not be disregarded as an externality. Additionally, this path and the disturbances on elk that will result from its construction will negate the investment in the two big game underpasses that were constructed to allow for elk and mule deer to continue to use the Lava Butte area.
4. Mule Deer – Mule deer is a management indicator species (MIS). Same comments as #3 above related to the impact of fragmentation and the use of the wildlife overpasses. The EA also argues that the project activities would not further reduce cover for mule deer but there would be potential disturbance and fragmentation of habitat. (EA, p. 77). The EA fails to adequately analyze cumulative impacts of other activities on the forest that have also resulted in fragmentation. A viability analysis including these cumulative impacts should be conducted for mule deer.

5. Northern Spotted Owl (NSO) – The EA states that the project is located outside of the Northwest Forest Plan and the range of the NSO. However, recent surveys on the Deschutes have discovered owls in areas outside of their range and within ponderosa pine stands. It is unreasonable to assume, with no analysis whatsoever, that the project would have no effect (direct, indirect or cumulative) on NSOs. In reality, NSOs are living in areas where they were previously thought not to occupy. Rather than make blanket statements of “no effect,” the Service should acknowledge that owls could potentially use larger ponderosa trees within the project area and that should NSO use be discovered in the project area, the Service would take proper measures to protect and comply with ESA requirements.

6. Winter use – Continually throughout the EA, the Service contends that not plowing the paved trail will control or inhibit winter use. This is unreasonable and untrue. The construction and existence of parking lots near a 50-ft wide, graded, open trail will result in use of the trail by cross country skiers, snowshoers and other types of winter recreation. Locked bathrooms will not deter people from using the trail. Completely disregarding winter use simply because the trail will not be plowed is ignoring the reality of winter recreation in the forest. The EA should consider impacts to wildlife resulting from regular winter use.

7. Failure to consider additional alternatives – The Service fails to present analysis of additional alternatives that might meet the purpose and need (which, as stated above, was not well researched or documented to begin with) with less fragmentation and impacts to the sensitive areas within the project area. Providing bike lanes on existing roadways or creating “shared roadways” are both options that concentrate use on areas that are already used and minimize fragmentation. These options are not addressed beyond a cursory mention (EA, p.14) and should be further explored, as they have the potential to minimize and concentrate impacts and prevent further habitat fragmentation. The argument that bike paths located adjacent to roads is unsafe is an unfounded one – numerous adjacent bike paths exist in cities and towns all over the country and they are considered safe.

8. Paved Path and Road closures – The rationale that the paved path is a positive trade off for closing 6 miles of road (segments 2, 3, 5 and 8) is not a strong justification for permanently paving 6 miles of trail. Although motorized vehicles will be eliminated from these existing roads, pavement has significant environmental impacts not discussed in the EA. Aside from the documented erosion and runoff impacts, asphalt contains coal tar pitch, a recognized human carcinogen, as well as polycyclic aromatic hydrocarbons (PAHs), which are known to be carcinogens. Pavement also creates heat islands – as
rainwater hits hot pavement it is heated and runs off at a hotter temperature than when it fell.\textsuperscript{1} The EA should have considered alternatives to traditional asphalt pavement, such as permeable or porous surfaces and non-PAH surfaces.

9. All comments submitted by Mr. Gail Carbiener, member of the Sierra Club, are incorporated herein by reference.

Thank you for your consideration of the above comments on this project. Please continue to include the Sierra Club on additional correspondence and responses related to this project. Correspondence may be sent to the address on file for the Sierra Club.

Sincerely,

Meriel Darzen
Member
Juniper Group
Oregon Chapter - Sierra Club

\textsuperscript{1} See “Paving Paradise: The Peril of Impervious Surfaces,” Environmental Health Perspective. 2005 July; 113(7): A456–A462.