

SHIELD TIMBER SALE (categorical exclusion)

The “Shield Insects and Disease Project Categorical Exclusion” (the Shield Timber Sale CE) proposes to log 2,938 acres within the Newberry National Volcanic Monument. Logging is proposed within forests adjacent to Paulina Creek, Paulina and East Lakes, and along scenic roads such as those to Paulina Peak and Cinder Hill.

The Newberry National Volcanic Monument is a national treasure, and renowned for its recreation, fishing, wildlife, scenic views, archeological sites, and other unique and precious ecological and human features. The area includes rocky outcrops, cliffs, and talus slopes, as well as marshy areas, lakes, stream habitats, and many other habitat features that provide unique habitat to notable and significant numbers of bird species as well as other wildlife.

The Newberry National Volcanic Monument supports many species that are considered to be Sensitive, ESA-listed, at-risk, or Management Indicator Species (MIS), or those that have other protections in place. Examples of species with documented suitable habitat or presence in or adjacent to the sale area include: Osprey (documented as breeding); Northern Goshawk; Peregrine Falcon; Three-toed Woodpeckers; Golden Eagles (documented as breeding); Bald eagles (documented as breeding); Olive-sided Flycatcher; Pacific Fisher; American Marten; Townsend’s big-eared bats; and Malheur (Prebles) Shrew. In addition, migratory waterfowl and other birds that rely on the area may be negatively affected by loss of habitat. Some of the birds that have been recorded in the area include: Tundra Swan; Cinnamon Teal; Blue-winged Teal; White-faced Ibis; Ferruginous Hawk; Flammulated owl; Great gray owl; numerous other owls and raptors; Vaux’s swiftl Prairie Falcon; Sandhill Crane; American Avocet; Black-necked Stilt; Willet; Long-billed Curlew; Wilson’s Phalarope; Western Kingbird; Savannah Sparrow; Brewer’s Sparrow; Lark Sparrow; Sagebrush Sparrow; Greebes; Wigeons; Spotted Sandpipers; Red-tailed Hawks; and many others.

The Forest Service is proposing to fast track this project without the full environmental analysis usually provided for most logging projects under the National Environmental Policy Act (NEPA). Categorical exclusions (CEs) should be used for their intended purposes such as maintenance of outhouses and picnic tables or other small and genuinely insignificant projects. A CE should not be conducted in such an ecologically unique area with so much at stake—and with such a high likelihood of significant negative impacts. In addition, the Shield area has numerous “extraordinary circumstances” (defined by federal regulations)—and therefore a CE is precluded. We believe that the Forest Service is violating federal law by attempting to circumvent NEPA and ram this project through as a CE—despite clear extraordinary circumstances within the project area. The presence of federally listed species or their designated critical habitat combined with well-documented mechanisms of potential harm to these species from this timber sale precludes use of a categorical exclusion for the Shield project. For example, habitat for Townsend’s big-eared bat (a Sensitive-listed species) is likely to be negatively affected through the loss of legacy trees such as snags (standing dead trees) during logging. A commercial timber sale will degrade and negatively impact the habitats and the viability of these and other species. We are also very concerned about negative impacts to important features in the area such as: floodplains and wetlands present around the lakes and Paulina Creek; the ecological integrity and the scenic quality within the Newberry Volcanic Monument (a congressionally protected area), American Indian religious and cultural sites, and archeological sites.

The Forest Service is attempting to justify logging in this area by claiming that the mortality and risks from insects and disease need to be reduced. However, the native insects and diseases that the Forest Service is proposing to reduce, such as Bark beetles, have co-existed and evolved with these western conifer forests for millennia, and serve important and beneficial ecological functions. Certain species, such as Black-backed woodpeckers (petitioned for uplisting under the ESA), are dependent on Bark

beetles as a primary food source. In addition, there is abundant scientific evidence that logging can exacerbate beetle outbreaks (in both the short and the long-term), and does nothing to slow or stop outbreaks. The project area is dominated by cool, high elevation, mixed-conifer forests, and includes abundant Lodgepole pine stands—many of which have naturally high mortality. Mixed-conifer forests (including those dominated by Lodgepole pine) are naturally denser than lower elevation Ponderosa pine forests, and also have infrequent fires that tend to burn at mixed and high intensities. Many areas within the project that are proposed for logging are not related to safe access for the public, such as the large blocks of forest directly adjacent to the lakes, riparian forests along the stream and removed from the main road, and side roads in scenic areas that loop/dead-end at unique features such as Paulina peak and Cinder Hill.

We have submitted comments on this sale, and will continue to oppose this sale as well as the inappropriate use of a CE for this project. We plan to field-check this sale next summer. Unfortunately, due to the shortened fast-track CE process used for this sale by the USFS, we may not get a chance to field-check it before logging is slated to occur. We are investigating our options for challenging this sale, potentially through litigation, and for demanding that the USFS conduct a full environmental assessment and public process.