

December 18, 2008

The Honorable Gail Kimbell, Chief  
USDA Forest Service  
1400 Independence Ave., SW  
Washington, D.C. 20250-0003

Dear Chief Kimbell:

The Federal Register Notice published on November 24, 2008 (73 Fed. Reg. 70956) indicates that the Mount Hood National Forest intends to amend the forest plan to accommodate the Palomar Gasline Transmission Project (PGT). I object the Forest Service's proposal to amend the Mount Hood Forest Plan for the sole purpose of constructing a 211-mile-long, 36 inch diameter pipeline across some of Oregon's most sensitive and treasures areas. I request that you immediately rescind the proposed amendment for this purpose which would dramatically alter the landscape of Oregon's most heavily-used forests.

The proposed construction would cross through both a current Wild and Scenic River in the Mount Hood National Forest, as well as one proposed in my Lewis and Clark Mount Hood Wilderness legislation, which was passed unanimously by the U.S. Senate Energy and Natural Resources Committee and is expected to be signed into law next year. It is also premature given the fact that the proposed pipeline would be to provide a connection to the proposed Bradwood Liquefied Natural Gas facility (LNG) in Clatsop County, which may never be constructed since the State of Oregon as well as other State, Federal and Tribal agencies are opposing the Federal Energy Regulatory Commission's (FERC's) decision to allow construction of Bradwood.

As described in the notice, some 47 miles of the proposed pipeline would cross through the Mount Hood National Forest. This would include the pipeline making up to 66 crossings of streams and rivers in the forest, including several rivers with such outstanding value that have been federally designated – or eligible for designation - as “Wild and Scenic.” It seems clear to me, that constructing a 75 to 120-foot-wide path through these rivers would jeopardize the salmon and steelhead habitat that helped win these rivers that designation. Additionally, the pipeline would also cross Fish Creek, which will be designated Wild and Scenic by the Lewis and Clark Mount Hood Wilderness Act. This legislation is the culmination of more than five years of negotiations with your own agency and more than 100 community groups and local governments as well as other members of the Oregon delegation, the Governor's Office, and the Bush Administration.

Furthermore, this proposal would amend several elements of the existing forest plan -- elements which were included in the forest plan with good reason and should not be dismissed lightly. For example, under the existing plan, the Fish Creek watershed has essentially been placed off limits. As described by the Fish Creek Watershed Restoration Monitoring Plan, the watershed is “the most geologically unstable watershed on the Forest.” The Northwest Forest Plan also

identifies it as a Tier One, key watershed and states that the “goal of key watershed is to maintain and recover habitat for anadromous salmonids at risk for extinction (USFS 1994).” To arbitrarily overturn these existing plan provisions appears to be extremely ill-advised, to say nothing of allowing a natural gas pipeline to be constructed in a watershed well known to be “geologically unstable.”

Beyond the substantial aquatic impacts of this proposal, the width and span of the right of way needed for a pipeline of this size would radically and permanently alter the forest landscape of one of Oregon’s most heavily-visited recreational forests. The Federal Register notes that the proposed route would directly affect approximately 709 acres of National Forest land, approximately 106 acres of which are old growth forests. As your agency is aware, I have been working on a forestry proposal to provide permanent protection for old growth forest that would re-direct focus on management activities to promote sustainable wood harvest, forest restoration, and rural development. I am deeply concerned that the Forest Service would counter our efforts to settle the ongoing and contentious debate over old growth by proposing a pipeline that would cut through two late successional reserves – reserves that have been designated under the Northwest Forest Plan.

In relation to the connection of the pipeline with the Bradwood LNG project, as you are aware, FERC approved a permit for the Bradwood project on a 4-1 decision. It did so over the strenuous objections of federal, state, and tribal resource agencies, including the Environmental Protection Agency and the Department of Interior. Indeed, since FERC’s September 18, 2008 vote to approve Bradwood, the State of Oregon, the Columbia River Inter-Tribal Fish Commission, and the National Marine Fisheries Service have all filed motions challenging the decision and requesting that FERC reconsider its Bradwood decision. Given that the actual construction of Bradwood is not, and should not be, considered a certainty, it seems unnecessary to move forward on plans to construct a pipeline that would connect to it.

In summary, I want to express my deep opposition to the Forest Service’s proposal to amend the forest plan which fails to recognize the potential for lasting damage to rivers and streams, as well as to the valuable forest ecosystems that will be bisected by the freeway-wide clear-cut necessitated by this project. As your own notice suggests, this would be inconsistent with the intent of the Wild and Scenic Rivers Act and the scenic vistas people have come to know and love in the Mount Hood National Forest. While no wilderness areas appear to be directly included in the path of the pipeline, the pipeline would get dangerously close to these gems.

The proposed location of the proposed Palomar pipeline through sensitive and treasured areas of the Mount Hood National Forest is unacceptable as is the Forest Service’s proposal to amend the forest plan to allow it. The cumulative degradation to both aquatic and terrestrial environment must be examined in a far more methodical process. I request that you immediately rescind the proposed amendment.

Sincerely,



Ron Wyden  
United States Senator

Cc: Mary Wagner  
Regional Forester  
Pacific Northwest Region

Gary L. Larsen  
Forest Supervisor  
Mount Hood National Forest