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April 2, 2009

Cindy Enstrom
Cascades Resource Area Field Manager
Salem District
Bureau of Land Management
1717 Fabry Road SE
Salem, OR 97306

RE: Comments to the Revised Environmental Assessment for the Gordon Creek Timber Sale

Dear Ms. Enstrom,

Thank you for the opportunity to comment on the Revised Environmental Assessment (EA) for the Gordon Creek Timber Sale. As you know Bark has been very concerned with this proposed project and we have stayed in regular communication with other alarmed residents in the Corbett area.

Since 1999, Bark has been actively working to protect and restore the ecosystems surrounding Mt. Hood by ensuring the public's involvement in our public lands. Our mission is to bring about a transformation of Mt. Hood forests into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation. As of writing these comments, we represent over 5,000 Oregonians who support our mission.

As you know, Bark leads regular hikes to the forest. We introduce citizens to the idea that their engagement in our public lands is an effective way to influence land management agencies to represent the true desire of the citizens most affected by their decisions. Since learning about the Gordon Creek Timber Sale, Bark hike leaders have led more than a dozen hikes to the proposed logging project. We have led young school groups, college class field trips, mushroom identification hikes, birding walks and trained more than twenty people how to read an EA and use it as a guide to better understand a proposed logging project. Having encouraged more than 150 people to submit letters and postcards over the public comment periods, our efforts to get people on the ground in Gordon Creek probably does not come as news.

I include this in with our comments to preface our appreciation for some of the changes to the proposal that were made in this revised EA. We understand that resources are not ample. And we do not want to perpetuate arduous processes of empty citizen involvement. Therefore, to be able to report to our members and supporters that, indeed, thoughtful and specific responses to agency proposals are considered and acted upon will go a long way towards informed and engaged community support for the health of these ecosystems.

We are very encouraged by the BLM's recognition and action on behalf of citizen concerns for this timber sale.

Some of the major concerns that were stated by Bark, the Corbett Water District, the Portland Water Bureau, Oregon Wild and many other individuals included: the impacts to the Corbett drinking water filtration facility, old-growth logging, and aquatic degradation caused by more roadbuilding. All of these issues have been at the least, more thoroughly assessed and at best, addressed through alterations to the proposal. We also are appreciative of the increased use of maps to communicate various components of BLM plans. We hope that this level of information will be provided in future timber planning documents.

In the face of the controversial Western Oregon Plan Revision (WOPR), we praise the Salem District for opting to release this Revised EA under stronger guidelines set by the Northwest Forest Plan. We hope that the district will continue to use its authority and continue to create timber plans under these directives during the grace period set by WOPR.

We hope that the BLM will take the comments received on this EA as the continuation of our past comments, but with another year and a half of visiting and learning about the impacts this logging poses.

CUMULATIVE IMPACTS

NEPA requires that the BLM analyze the cumulative impacts, “which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future projects” either federal, local or private. (40 C.F.R. § 1508.7)

Throughout the Revised EA the Gordon Creek 6th field watershed is used as the scope of analysis for cumulative impacts. The Northwest Forest Plan standard for cumulative effects analysis is 5th field. For example, The NWFP and Salem RMP require the BLM to “Retain late-successional forest patches in landscape areas where little late-successional forest persists. This management action/direction will be applied in fifth field watersheds (20 to 200 square miles) in which federal forest lands are currently comprised of 15 percent or less late-successional forest. (The assessment of 15 percent will include all federal land allocations in a watershed.) Within such an area, protect all remaining late-successional forest stands.” NWFP, C-44. Given the high percentage of private land in the Lower Sandy River 5th field watershed, Bark is concerned that a reliance on the Gordon Creek Watershed Analysis, which covers the 11,000 acre (or approximately 17 square miles) tributary drainage to the Sandy River, will result in unnecessarily significant impacts.



As we visit timber sales, Bark volunteers have included an aerial map in their necessary toolkit for assessing the cumulative impacts of proposals to the area they are visiting. The Gordon Creek Timber Sale has been a challenging proposal to visit because of the many locked gates and while we have visited every unit in the sections, we have heard from concerned residents in Corbett who have not had the time or ability to walk the several miles

into the units. In particular, this Revised EA has come out at a time when tree windthrow and snow has made the roads impassable for the duration of the comment period. We strongly

encourage the BLM to include any aerial images they may have in their public documents. These offer invaluable understanding of not only the location of the forests, but also the proximity to industrial logging operations and the buffer our intact public forests often offer drinking water sources.

The EA includes a more thorough assessment for the seasonal changes to impacts caused by use of the existing and future roads in the area. However, analysis with regards to the cumulative impacts to the Gordon Creek watershed from use of these roads for the project falls short. The EA proposes to expand the logging and hauling season in an effort to make the project more sellable to timber operators. However, there is no analysis of whether the use of the public roads by private operators will have an additional impact with these lifted restrictions. The BLM should suspend all private use of the roads for additional log hauling operations to avoid unintended consequences of restriction lenience.

REASONABLE RANGE OF ALTERNATIVES

The minimal range of alternatives to the Proposed Action presented in this Revised EA remains unacceptable. Under the National Environmental Policy Act (NEPA), the agency must provide a reasonable range of alternatives to compare. The BLM has presented two other alternatives with the No Action alternative and the Proposed Action. However, these alternatives do not represent the suggested alternatives brought to the agency by the public.

Both of the action alternatives include extensive use of helicopter logging throughout the units, particularly in Section 1. This section was likely the focus for many of the comments received in the first EA comment period. Not only does it contain a water intake for the Corbett Water District, but there have been continual sedimentation issues for the North Fork of the Gordon Creek due to two road crossings, one past and one current.

UNRESOLVED FROM THE PREVIOUS EA

As stated above, we appreciate the effort that the BLM has gone to addressing some of the concerns raised from the last EA. However, we continue to have several of the same concerns that have not been adequately addressed or considered. Please consider the following from our original EA comments and additional comments with regards to new information:

Snag Buffers

What measures did the BLM take to avoid the felling of snags when planning those roads that appear to put snags of varying stages and ages at risk? We see snag buffers being an important safeguard.

Economic Impact of Turbidity Increase

The Revised EA does not consider the costs that are potentially going to be incurred by the impact of the use of the roads. This may be a short period in the lifespan of a forest, but for a small community the costs of buying water from other communities can have long-lasting impacts on the economic stability.

Insufficient "no-cut" buffers on streams

Just a few miles away in the Bull Run Watershed Management Unit, there are an expected 220-440 ft not-cut buffers on the streams for any treatment needed. Why should Corbett be expected to live with such a significantly larger risk to their water supply than the residents of

Portland? We hope to see the Stream Protection Zones increased to at least 220 ft.

Roads

How could restoration possibly begin to happen when a road continues to threaten water quality, invite unwanted vehicle use and chemical runoff and introduce a host of invasive, non-native species...Sixty-five miles of roads already exists in the Gordon Creek watershed and approximately 25% of the roads are within 200 feet of a stream. (Gordon Creek WA 1-8)

It is also stated that the plan will install 6.5 new miles of road in the area. (Revised EA 16). According to the Gordon Creek Watershed Analysis there is already 3.7 miles of road per square mile. Many of these roads cross streams, are situated on side of steep slopes, and provides opportunity in the rainy season for water to run directly over the roads, adding mass sediment to the streams. This proposal needs to do much more to address the excessive roads in the area and not further contribute to the problem. The RMP states, "Tier 2 watersheds should not have an increase in road mileage." (RMP, 7)

We have concerns that the BLM is planning to "store" the roads that they are renovating and building, when they should be adequately removed at the completion of this logging project. The EA states that, "For roads that are expected to be used in approximately the next two decades...culverts and the subgrade would be left intact so that the road can be renovated for future use or fire control with minimal disturbance and expense." (Revised EA, 25) However, the EA also states, "The Resource Area has determined that these stands are approximately 15 years short of CMAI, therefore they are not ready for regeneration harvest at this time..." (Revised EA, 34)

In considering the recent changes under the WOPR, regeneration harvest is being considered again, as seen in the Salem District by the Ginger Creek Timber Sale in the Tillamook Area. By not including this foreseeable future harvest in the analysis to determine full removal of road beds and culverts versus roads to "store," we do not see that the BLM has complied with the cumulative impact analysis under NEPA. How can the agency justify building roads that will continue to have impacts for more than a decade, in order to use them for the liquidation of these forests in fifteen years?

Impacts to Fish

It seems highly contradictory to be restoring the fish passage on the North Fork Gordon Creek, while building a new road and stream crossing with temporary culvert, upstream from this restoration effort. As the EA states, the increase of sedimentation and turbidity is likely. We will actively monitor the ability for the BLM to return this fish run back to its native state, including the full removal of the road into the middle of Section 1.

Larch Mountain Education Site

The Revised EA, again, has only acknowledged the presence of this education site and not assessed the impacts that logging will have on it as a resource for local schools to use for field trips. Although old-growth logging in Section 3 has been dropped, there is still planned logging around the trail that leads to the "Big Tree," which is actually a very large old snag. We expected that the BLM would place a buffer around this trail and the snag. However, the trail will be converted to a haul road. What stakeholders, such as school teachers, were consulted to assess the impacts on this resource for education in the community?

In addition, the EA addresses some concerns for the conflict of having school trips using Road 1-5E-3 during active logging. The safety concerns are more than obvious with young children in the vicinity of large logging equipment and hauling activity. It seems that this could be a factor when considering the changes to seasonal logging restrictions. In the summer, schools

are not in session and therefore, the conflict would not be as likely. However, allowing the haul season into the fall and winter months would increase such likely conflict.

Portland Water Bureau and Impacts to Bull Run

We cited the letter sent to the BLM in response to the original EA by the Portland Water Bureau. They included a recommendation to drop the portion of Section 13, southeast of the BPA lines. Why was this not considered in the range of alternatives? The Bureau has serious concerns for the ability for access to the closed Bull Run Management Unit from the roads needed to log these areas.

We share the concerns that the City of Portland has expressed with regards to increased fire risk caused by this logging project. The additional “edge” caused by this logging project will leave the remaining trees in the Bull Run susceptible to increased windthrow and blowdown scenarios. Although the EA provides a range of fuel management, it is difficult to determine whether this will be impacted by the additional fallen woody debris.

The steep slopes in the southeast corner of Unit 13 do not seem like acceptable areas for the mastication equipment to be set upon. Which of the fuel treatment options would take place here, otherwise? Will they address the additional debris from windthrow along the border with the Bull Run in the consideration for predicting the decomposition rate?

Impacts to Northern Spotted Owls

We are glad to see the BLM taking the time to survey past known nesting sites in the Gordon Creek project area. Although, these nesting sites were not confirmed to be occupied, we are still very concerned about the 1,724 acres that provide dispersal habitat to this federally-listed species. (Revised EA, 104)

Late Successional forest retention

The Revised EA states that 8% of the Gordon Creek 6th field watershed is in “older forest” condition. This falls short of the Northwest Forest Plan’s requirement for 15% retention at C-44. In addition the 8% estimate is based on a 6th field watershed level, not 5th field as recommended in the Plan. The number would likely decrease if the analysis were completed at the 5th field level.

Variable Density Thinning in Riparian Reserves

In walking this timber sale, we have not seen the need for Variable Density Thinning in Riparian Reserves or several areas within the Matrix forests. Please see our additional photographs from recent visits to the forest. We have witnessed a range of age and species in many of the forests.

Off-Highway Vehicle Use

The Gordon Creek Watershed Analysis recommends, “Off-road use by four wheel drive vehicles, all terrain vehicles, and motorcycles is not compatible with resource management objectives on BLM-administered lands in the Gordon Creek Watershed because of concerns associated with erosion, vegetation damage, water quality, and fisheries and wildlife disturbance. Though not expressly authorized, use of private forest land by off-road vehicles may currently occur unless access to the area is physically restricted.” (Gordon Creek WA, 11-10) The Revised EA has not adequately shown how mitigation measures will effectively stop any future use of this road and trail system for motorized recreation.

We would like to include, by reference the comments of the Portland Water Bureau, the Corbett Water District and Oregon Wild. Thank you for your ongoing commitment to hearing the concerns of the public over this proposal.

Please feel free to reach me for further clarification or questions.

Sincerely,

Amy Harwood
Program Director

cc:

Jim Jans
Corbett Water District

Richard Robbins
Portland Water Bureau