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Bark appreciates the opportunity to comment on the *Draft Environmental Impact Statement (EIS)* for the Western Oregon Plan Revisions (WOPR). Bark has been working with Oregonians living on and around Mt. Hood for over ten years. Our mission is to bring about a transformation of Mt. Hood's 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 8,000 Oregonians who believe in our mission.

For almost ten years we have monitored the activities of the Salem District Bureau of Land Management (BLM) as it pertains to key Mt. Hood watersheds and surrounding communities. Much of our work focuses on the Mt. Hood National Forest. We are consistently disappointed that Forest Service efforts to better manage the forests for world-class recreation opportunities and clean drinking water before corporate profit for logging companies have not been matched by their counterparts in the BLM.

The WOPR proposal and its ensuing controversy over management direction has jeopardized years of trust built between the public land agencies and the public. The Northwest Forest Plan is a landmark agreement that private, state and federal landowners rely on to protect threatened old growth species while producing timber in compliance with environmental law. Removing BLM forests would unravel the whole fabric of the Plan.

The WOPR proposes widespread clearcutting of public forest, which could reduce property values and the quality of life of thousands of Oregonians living near BLM lands. Over 1,000 miles of new logging road and 140,000 acres of clearcuts in the first decade alone would further scar Oregon's spectacular landscape. Over the past 100 years, timber companies and the federal government have logged most of the Pacific Northwest's ancient forests, an estimated 18% remain. The WOPR adversely affects almost one million acres of the region's remaining mature and old growth forests. The Salem District land designation changes proposed are as follows:

Matrix (Timber harvest lands) 13% to 44%
Riparian (Streamside protection areas) 12% to 8%
Late-Successional Reserve (Future old-growth forests) 54% to 23%

The tripling of those forests targeted for logging (matrix) and the reduction of acres reserved for old-growth (late-successional reserve) is unacceptable.

THE WOPR THREATENS WATER QUALITY

Bark has very large concerns about how the WOPR will impact water quality. Western Oregon BLM lands host more than 20,000 miles of rivers and streams, and more than 218,000 acres of lakes, ponds and wetlands, providing clean water, wildlife habitat and recreational opportunities. The WOPR would reduce protections for Oregon's creeks and log over 200,000 acres of currently protected streamside forests. Logging adjacent to streams is known to harm water quality, sensitive native fish and other aquatic life.

Watersheds that include BLM lands produce drinking water for tens of thousands of residents in 76 communities in Oregon. Shockingly, the BLM claims minimal or no effect on fish, floods and sediment despite a massive increase in clearcut logging. (EIS, 723) Alternative 1 of the WOPR proposes to cut "riparian management" areas by half for flowing fish-bearing streams. (EIS, 751) This is an unacceptable change in necessary protections for water quality and fish habitat.

Gordon Creek

Bark is familiar with the BLM's willingness to put integral waterways at risk because of the Gordon Creek Timber Sale in the Salem District. This timber sale proposes to log along the Gordon Creek, current habitat for Lower Columbia River coho salmon and winter steelhead. Yet, the project proposal has almost no mitigation efforts to protect these threatened species. The preferred alternative of the WOPR would provide even less protection at the site level for these fish.

Additionally, Bark is strongly opposed to the building of new forest roads in the Salem District area. Thousands of miles of logging roads already criss-cross our landscape and watersheds, causing immeasurable damage every year. When agencies come out with projects that include new road-building, such as the Gordon Creek Timber Sale and the WOPR, we are immediately skeptical of any restorative intentions that may be claimed. Restoration cannot 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?

Most notably in the case of Gordon Creek is the impact to the drinking water of the nearby town of Corbett. Corbett relies on clean water from Gordon Creek and the logging project proposes to remove trees from exceedingly steep slopes along the banks of the creek, threatening the town's water supply and putting their treatment facility on an increased and unreasonable strain from sediment and runoff. Just a few miles away in the Bull Run Watershed Management Unit, there are 220-440 ft no-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? The towns surrounding Portland, such as Corbett are steadily growing in population. Demands on the water supply are increasing with this growth and these

small communities cannot be expected to keep up with growth, while federal forest management decisions threaten basic infrastructure.

THE WOPR THREATENS RECREATION

While numerous quiet and non-motorized recreational activities on public land become more popular every year (a projected 27% annual increase), motorized recreation (only a projected 2.3% annual increase) takes priority in the WOPR. Motorized recreation has long been established as a threat to public land and other recreation users. In 1972, President Richard Nixon established Executive Order 11644 to protect these lands from abuse. Thirty-one years after President Nixon identified off-road vehicles as a threat to our public forests, then Forest Service Chief, Dale Bosworth, re-emphasized his concerns by naming unmanaged recreation (primarily motorized) as one of the “four threats” to our National Forest System¹.

By taking an open-unless-otherwise-closed approach to off-highway vehicles (OHV), the BLM is accepting an impossible challenge. We have found alarming disregard for signage and road closure that cannot be enforced by such limited staff resources. Furthermore, managing motorized use under such a management scheme was deemed insufficient by the Forest Service, and thus all national forests are changing to a closed-unless-posted-open scheme. This approach has shortcomings as well, including a lack of law enforcement, but it is the minimum action that the BLM could take to improve conditions in the forest and comply with Executive Orders 11644 and 11989.

Some landscapes can tolerate a modest level of Off-Highway Vehicle (OHV) use. Landscapes near residences, sensitive habitats, streams and wet meadows are places where OHV use is not appropriate, as it can cause erosion, impair water quality and disturb wildlife. OHVs create an incredible amount of noise and pollution, and the damage caused by irresponsible riders can be alarming.

Annie's Cabin

Bark has concerns over the BLM's failed prioritization of quiet recreation, despite the overwhelming support by the public for this trend in public lands. Our experience with the Annie's Cabin Timber Sale in the Molalla River Corridor has demonstrated that the BLM does not see the great potential, economically, environmentally and socially, in ensuring quality recreation on BLM lands where opportunities are possible.

In the case of Annie's Cabin, the Salem District decided to log throughout the citizen-created and maintained Molalla River Shared-Use Trail System. Local mountain-bikers and hikers from the community who regularly enjoyed the trail system organized to try and stop the timber sale from happening. However, in the end the BLM did not adhere to the citizen demands and will log around the trail system, as well as open old roads that had been converted to hiking trails.

Bark is incredibly frustrated to see that this trail system is expected to be decreased by 440 acres if any of the alternatives are chosen. (EIS, 140) Although this trail system

¹ Dale Bosworth. “Forging a Sustainable System of Routes and Areas for Motorized Use” OHV Collaborative Summit San Diego, CA (April 12, 2005) Retrieved on October 31, 2007. For more information, see <http://www.fs.fed.us/projects/four-threats/index.shtml>

represents an important achievement within the community to provide a shared-use opportunity between horseriders, bikeriders and hikers, it was not intended to be extended to the motorized recreation community. By reducing the number of acres closed off to Off-Highway Vehicles, the spirit of this community effort becomes moot. This is another black-eye to the communities of the Molalla River.

Conclusion

We appreciate the opportunity to comment on the Western Oregon Plan Revisions. We have concerns about the breadth of these revisions, spanning six large districts and a diverse landscape of Cascade forests. The Environmental Impact Statement provides an impressive synthesis of ecological, cultural and economic information for the public, however, we do not support tying the hands of district ranger's ability to respond to community involvement in public lands decisions.

For further response to the BLM's proposed changes, Bark incorporates by reference the WOPR EIS comments of Oregon Wild and Molalla Riverwatch.

Thank you,

/s/ Amy Harwood

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cc:
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