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January 8, 2008

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Western Oregon Plan Revisions

P.O. Box 2965

Portland, OR 97208

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)**

U.S. Department of the Interior Bureau of Land Management:

This letter shall serve as the City of Salem's formal comment on the U.S. Department of the Interior Bureau of Land Management's (BLM) Draft Environmental Impact Statement (EIS) for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts.

The City of Salem provides drinking water to over 180,000 customers and relies on the predictable high quality source water from the North Santiam River as its primary source. Therefore, the City's primary concern with any management plan affecting land within the North Santiam River watershed is the resulting impact on downstream water quality. The City has generally been in support of the current Northwest Forest Plan management techniques and believes that the work being conducted by BLM staff in the Cascade Resource Region follows the guidelines and meets the goals of the current plan. However, the City is concerned that the Draft EIS for the revised Resource Management Plan deviates from previous water quality protection goals of the Northwest Forest Plan. The United States Department of Agriculture Forest Service (USFS) has published the "First-Decade Results of the Northwest Forest Plan"<sup>1</sup>, which found that watershed conditions overall did improve slightly in this short period by adhering to the current plan.

Research published in the Draft EIS suggests that if there is more than 25-100 feet of filtering strip between unprotected soil surfaces, there is usually not a risk of transporting sediment to streams<sup>2</sup>. The City believes a greater stream buffer width is needed to ensure that sediment is trapped in the forest floor duff and vegetation. Belt et. al. (1992) reported that filter strips on

<sup>1</sup> First-Decade Results of the Northwest Forest Plan. [www.fs.fed.us/pnw/publications/qtr720/pnw-qtr720.pdf](http://www.fs.fed.us/pnw/publications/qtr720/pnw-qtr720.pdf)

<sup>2</sup> Oregon State Office, 2007. Draft Environmental Impact Statement for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management Districts. Volume 1. Pg 373.

the order of 200-300 feet are generally effective in controlling sediment that is not channelized<sup>3</sup>. In addition, the City is concerned about the potential impact on sediment load on watershed streams by increasing the number of acres of regeneration harvest. The No Action Alternative would continue regeneration harvest at 60,500 acres, where Alternative 2 increases regeneration harvest to 143,400 acres. A portion of these cuts would disturb previously protected stream filter strips and potentially adversely affect stream water quality. Stream bank erosion has been shown to increase 250% over pre-harvest levels after clear-cutting, but only 32% over pre-harvest levels where buffer strips were utilized (Belt et.al., 1992).

The City of Salem is concerned that this revised plan proposal reduces the protection of water quality in the North Santiam River watershed. The City believes the revised plan fails to adequately protect water quality for Salem's drinking water source by reducing stream buffer widths and increasing regeneration harvesting volumes. The City would prefer that BLM continue to use current stream filter strips similar to the distances in the No Action Alternative. The findings in the USFS Northwest Forest Plan report are encouraging, but it will take BLM's current forest management and more time for the forest to gain complex structure to see the full potential of benefits to water quality and habitat.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sophia Hobet', followed by a period.

Sophia Hobet

Water Services Manager

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<sup>3</sup> Belt, G., O'Laughlin, and Merrill, T., 1992. Design of Forest Riparian Buffer Strips for the Protection of Water Quality: Analysis of Scientific Literature. University of Idaho. [www.uidaho.edu/cfwr/pag/pagr8.html](http://www.uidaho.edu/cfwr/pag/pagr8.html)