

Bark

PO Box 12065
Portland, OR 97212
(503) 331-0374
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ONRC Action & ONRC Fund
5825 N Greeley
Portland, OR 97217
(503) 283-6343
Brenna Bell

Oregon Wildlife Federation
3020 SE Yamhill
Portland, OR 97214
(503) 234-2613
Joe Keating

Sierra Club
3701 SE Milwaukie, Suite F
Portland, OR 97202
(503) 238-0442
Carol Porto

Santiam Watershed Guardians &
American Lands Alliance
PO Box 11407
Eugene, OR 97440
(503) 788-1015
Laura Berglan

Cascadia Forest Alliance
PO Box 4946
Portland, OR 97208
(503) 241-4879
Ivan Maluski

Christine Pazzula
Acting District Ranger
Clackamas River Ranger District
595 NW Industrial Way
Estacada, OR 97023

CERTIFIED MAIL

Orchard Project Area EA

Dear Ms. Pazzula,

We are writing to comment on the Orchard EA. We have a number of serious concerns with the proposed action.

I. Road building in an LSR

We are strongly opposed to any activity which will degrade the quality of an LSR. You cite the Northwest Forest Plan Standards and Guidelines, page C-16, in the EA, but that statement certainly does not support road-building in an LSR for a project outside the LSR. The standard states “If new roads are necessary to implement a practice that is otherwise in accordance with these guidelines . . .” But the proposed action is not otherwise in accordance with the standards for LSRs. There is absolutely no provision in the NWFP which allows degradation of an LSR for activities taking place outside the LSR.

We dispute the claim that the road building needed to avoid the LSR would be on a 40-50% slope. We have walked unit 1 from end to end and side to side. The top of the unit is relatively flat, with ample room for a road. This statement seems calculated to raise alarms and sway opinions, with no basis in fact.

II. Logging in Riparian Reserves

We are also opposed to all commercial logging in Riparian Reserves. Under the Northwest Forest Plan, logging may occur in riparian reserves only when needed to achieve the ACS. You have shown no need here. You rely merely on the “delay” of achieving structural diversity if no action is taken. This is not a need, but rather a desire to log more trees. That doesn’t cut it under the Northwest Forest Plan requirements.

III. No more roads!

2.2 miles of new roads are 2.2 miles too many! Your use of the term “temporary” is deceptive, as there is truly no such thing as a temporary road. Road density in this watershed is already 3.46 miles per square acre - excessively high. Moreover, your classification of all the roads in the Orchard area as closed is suspect. Although gated, these roads show signs of regular and heavy use. Access may be limited, but these roads do not qualify as closed. Thus, the road density is actually much higher than reported to the public in the EA. With this high density, you should not be building even more roads.

IV. The proposed action will violate the ACS

“Thinning in Riparian Reserves may pose a short-term risk to water quality and fisheries habitat . . .” Short term degradation of water quality is a violation of the Aquatic Conservation

Strategy, regardless of the basis for the short term degradation. “There is some risk of sediment entering a stream.” How exactly will this enhance water quality, as required by the ACS?

The existence of no-cut areas adjacent to streams reads as an admission of the dangers of riparian reserve logging. If the logging you propose in the riparian reserves is so benign, why do you need no cut buffers?

Moreover, there is a rare aquatic lichen - *Hydrotheria venosa* - in the riparian area between units 1 and 2 that is very sensitive to siltation. The steps for protection state only that sedimentation and disturbance will be “minimized.” Minimizing negative effects to water quality and the riparian dependent species therein does not rise to the level of “maintain and restore,” as required by the ACS.

V. The mitigations are insufficient to protect remnant old-growth and water quality

The mitigations state that “old-growth trees present in thinning stands would generally not be targeted to meet snag requirements.” You should use stronger language here. We suggest stating the old growth “will not” be topped for snag creation.

We are also concerned to potential damage caused by using old growth trees as skyline tail trees. Even if the trees are not completely girdled in the process, they will be dramatically weakened and their lives shortened.

Also, avoiding yarding corridors through riparian reserves “where possible” is too weak. As is avoiding landings within riparian reserves “if at all possible.” These statements reveal your bias towards cutting trees despite damage to the riparian reserves.

The mitigation measures may just “substantially reduce” sediment delivery. Again, this is not good enough for protection of water quality.

VI. Survey and Manage requirements

We assume that all surveys for survey and manage species, including red tree voles, will be conducted in accordance with the recent ruling by Judge Dwyer in ONRC et al. v. US Forest Service et al.

VII. Alternatives

While we were generally pleased at the number of alternatives, we would like to see one containing the no road building feature of Alternative C and the no commercial logging in riparian reserves feature of Alternative D. These are the two greatest concerns of us and our constituents, yet there is no alternative that addresses both these issues.

We would also like to see one more alternative addressed: a restoration only alternative. Such an alternative might include prescribed and natural fire, road closures and obliteration, and

planting of native species. We would also like to see an economic analysis of this type of analysis, including the existence values on keeping an area unlogged, as well as the long term costs and benefits of returning fire to this area. This restoration alternative should also recognize that matrix lands are not timber emphasis. One of the primary roles of matrix is “to perform an important role in maintaining biodiversity.” This role of matrix is ignored in the EA.

We ask that you withdraw this EA and prepare a supplemental EA, including in it the suggestions we make above. The Orchard project as proposed in the EA is not in the spirit of the Northwest Forest Plan - it places logging over the protection of water quality, old-growth and biodiversity.

Sincerely,

Gregory J. Dyson,
Bark