

## Rusty Saw Timber Sale

-what: EA comments - specific comments on the Environmental Assessment prepared by the BLM

-when: Comments must be received by the BLM by Wednesday, **June 30, 1999**

-district: Salem BLM

-legal description: T3S, R5E, section 11

-general area: The units are in an island of BLM land that is surrounded by private Longview Fiber land and is immediately south of the North Fork Eagle Creek. The Longview Fiber forest has been excessively cut, and active logging is taking place adjacent to the BLM land and the North Fork Eagle Creek. The sale is about 3 miles NW of the Eagle tree sit.

-watershed: Eagle Creek

-size: 182 acres

-volume: 1.368 million board feet

-riparian reserves: proposed 6 acres of cutting in riparian reserves

-roads: 1.5 miles of road reconstruction

-Northwest Forest Plan land allocations: Matrix and Tier 2 Key Watershed

-district contact: Randy Herrin, (503) 315-5924

-send comments to: Richard Prather, Cascades Resource Area Manager, Salem District, Bureau of Land Management, 1717 Fabry Road SE, Salem, OR 97306 - fax (503) 375-5622

### -proposed actions:

1. Commercially thin 176 acres
2. "Treat" 6 acres of Riparian Reserves - leaving a 75 foot no cut buffer along the streams - and leaving 50 to 100 trees per acre
3. "Renovate" 8000 feet of road "to bring it back up to standards" - then block or gate the road (2 separate roads)

### -a few thoughts from Bark:

1. The Forest Service's Eagle, Beagle, Talon & Claw sales, known collectively as Eagle, plan to log over 28 million board feet from the Eagle Creek watershed. The watershed analysis recommends that only 10 million board feet of trees are removed per decade. The Eagle sale will dramatically exceed the watershed analysis recommendation, and the Forest Service has stated that to make up for this, they will plan no more timber sales in the Eagle Creek watershed for 30 years. That doesn't really help much if the BLM goes ahead with its sales in the watershed, boosting the total trees removed from the watershed in 2-3 years over the 30 year amount. The BLM has not considered the cumulative impacts of these two federal actions (Eagle and Rusty Saw).

2. Longview Fiber is clear-cutting all over the Eagle Creek watershed, including right next to Rusty Saw and the North Fork Eagle Creek. The BLM has failed to take into account the cumulative impacts from the damage being caused by Longview Fiber and the proposed Rusty Saw sale.
3. Note, in relation to issues 1 & 2, that Eagle Creek is already listed as water quality limited by the Oregon DEQ. And, the entire Eagle Creek watershed is a Tier 2 Key Watershed (Tier 2 watershed are defined in the Northwest Forest Plan “as sources of high quality water.”)
4. There should be no commercial logging in these Riparian Reserves. The BLM is claiming the logging will speed up the achievement of old-growth characteristics and the amount of down woody debris (large trees on the ground), which in turn will be better for long-term water quality. But, of course, the groves of trees will achieve all the necessary characteristics for protection of the streams and water quality just fine on their own, it might just take a bit longer. The main factor here is the damage caused by the logging operations: they will negatively impact the watershed, even the BLM admits this in the EA. This short-term negative impact is not worth any undocumented claims that these actions will help in the long-term.
5. The road “renovation” is a farce. Bark has visited the Rusty Saw sale and has seen that these 1.5 miles of roads are re-vegetated. The BLM plans to re-open these roads that are no longer causing any negative effects to the watershed and to wildlife. In so doing, they will effectively be adding 1.5 miles of roads to the road density, with the associated effects to water quality and wildlife. After the sale, they will block or gate the roads, which will leave them open to ORV abuse and continue the negative impacts for years if not decades. Also, they are required by the Northwest Forest Plan to reduce all road mileage in Tier 2 watersheds. Reopening and then blocking or gating these roads does not qualify as a reduction in road mileage.
6. Under the Northwest Forest Plan, the BLM is required to survey for a bunch of plants and animals (the C3 survey and manage species, including the red tree vole). They have only surveyed the area for mollusks, which is a start, but it doesn’t fulfill their requirements.