



## COMMENTS NEEDED: Orchard Timber Sale

Deadline: July 24<sup>th</sup>, 2002

The Orchard timber sale was first proposed back in 1988. The Forest Service prepared an Environmental Assessment (EA) and held a comment period on the EA, but they never made a decision on the sale. In fact, they couldn't make a decision because the sale was held up by the Survey & Manage lawsuit, which forced the Forest Service to follow the Northwest Forest Plan and survey for rare species before they logged.

Well, the surveying is complete (if somewhat half-heartedly) and the sale is back! Which means it is time for us to comment on the sale again. And what changes has the Forest Service made to the sale in the intervening 4 years, you might ask? NOTHING!

The Orchard EA proposes several alternatives, the most egregious of which is Alternative B, the Proposed Action. Alternative B includes:

- 230 acres thinning of second growth stands
- 16 acres thinning in riparian reserves
- 4 acres of regeneration (clearcut)
- 2.2 miles of road building (including 200' in a Late Successional Reserve)

Alternative C is the same for B except includes no road building.

Alternative D is the same for B except includes no commercial logging in riparian areas (they would girdle trees and leave them be, instead).

Alternative E is the same for B except includes no road building in the LSR, and instead has 1900' of new roads outside the LSR.

Alternative A is the no-action alternative (required by law to be considered in the EA).

### **Here are five main comment points:**

- a. There should be no new road building, period. That would also take care of the issue of whether to build 200' of road in a Late Successional Reserve (LSR) or 1900' road outside of the LSR.
- b. There should be no logging in riparian reserves, period.
- c. No logging of mature and old-growth trees. They are becoming such a rarity that they should be protected wherever they still exist.
- d. Where is the restoration without commercial logging alternative? The Forest Service is refusing to recognize that they can rehabilitate forests without running a commercial logging program. We need to raise this issue loud and clear.
- e. The economic analysis is faulty. Somehow, despite more time spent planning the sale and dropping timber prices, this sale has become MORE economical. According to the new EA, after four more years of planning, the cost of preparing this sale has actually gone DOWN. Plus the value has supposedly risen despite timber prices dropping. How is this possible?

The Orchard project is not in the spirit of the Northwest Forest Plan - it places logging over the protection of water quality, old-growth and biodiversity.

Send comments, postmarked by Wednesday, July 24, to:

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