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Cindy Enstrom
Cascade Resource Area
1717 Fabry Road SE
Salem, OR 97306

Dear Ms. Enstrom,

Please accept these comments on the Gordon Creek Environmental Assessment and Finding of No Significant Impact. Bark appreciates the opportunity to express our concern for this proposed timber sale. Upon visiting the area numerous times, we continue to view this project as flawed. We recommend that the BLM consider revisiting the environmental assessment process, particularly with regards to the impacts on the Corbett Water District.

PUBLIC INVOLVEMENT/BLM DATA

As usual, we have come to expect insufficient maps included in the public record for the BLM's logging projects. The maps for the Gordon Creek Planning area on page 11 and 91-96 fail to include pivotal reference points for allowing the public to understand the true impact of this logging. Important features that should have been represented in maps provided to the public include, but are not limited to: Drinking water intakes, hiking trails, the Bull Run Watershed Management area, Larch Mountain Education Site, significant slopes and culvert replacement sites.

"In addition, up to six openings of low density retention (retaining approximately 12-20 trees per acre) would be created to provide open area and edge habitat..." (EA 16) A "low density retention" with no size or age parameters on which only 12-20 trees per acre would be left standing is a clearcut. For whom would this open area be provided? To our knowledge, the BLM holdings in the Gordon Creek watershed is surrounded by ample open area by the private industrial logging. At this time Bark is unaware of the environmental benefits or implications of "edge habitat." None of these six areas are described further or identified where they will take place in the project area. Therefore, Bark cannot comment to the specific concerns we have for these six areas.

OLD GROWTH LOGGING

Several of the sections in this logging project include some of the remaining mature trees in this area. We see no benefit to logging mature stands of trees, particularly trees over a hundred years old. In fact, we see the loss of these trees to this recovering ecosystem posing grave risks for the integrity of the forest. Section 3B and 15A has documented old-growth trees (EA, 59) and Sections 1 and 11 contain trees that appear to be older than the provided table (EA, 89). The timber sale boundaries, tree markers and road flagging is scant in the field and there is no commitment from the BLM to ensure that these older, important trees will remain should this area be logged.

As mentioned elsewhere in these comments, the cumulative impact of the surrounding timberlands has left these pockets of public lands as the only viable habitat for species dependent on older, moist forests in the area. Species known to be in the area, such as the Oregon slender salamander and the northern spotted owl are dependent on these older forests. We do not see how this watershed will be able to provide habitat to such important species for wildlife diversity should the small remaining older forests be harvested.

Old growth forests play a vital role in our region's biodiversity—including but not limited to carbon sequestration, clean drinking water, healthy fish runs and recreation. The Northwest Forest Plan acknowledges old forests' value as a legacy of biodiversity, and calls for their protection. The Gordon Creek Watershed is in a highly fragmented condition already, with very few interior patches of old growth left. Less than one percent of the watershed is in Late-Successional Reserve and otherwise, the entire watershed has been left to aggressive harvesting under GFMA designation and private industrial logging. Less than 10 percent of BLM forests in the watershed are in mature and older forest seral stages. (Gordon Creek WA, 5-4)

The RMP states "retain late-successional patches in landscape areas where little persists." (RMP 21) Although this applies to fifth field watersheds and the BLM is utilizing a sixth field watershed analysis for this area, we see this importance of this management direction being applied here. There are 117 year old trees in this timber sale. Trees that reach this level of maturity inevitably influence the surrounding forest.

SNAGS and DOWNED WOODY DEBRIS

One of the welcome surprises in this forest is the diversity in decay class. Unlike many second-growth forests, several of the sections proposed for harvest have a unique quantity of standing and downed woody debris. Much of the BLM lands in the Gordon

Creek watershed have been heavily logged in the past and this often leads to an overcrowded regenerating stand. However, areas such as 11A and B have a diversity in the decay class that gives this recovering forest great potential from nutrients in the decomposing process to ideal habitat and foraging for many species.

Not only would logging operations threaten this existing condition, but the flagging for the proposed roads shows a disregard for it. When we followed the flagging along the proposed road through 11B in the preferred Alternative 1, it appears that roadbuilding would require the removal of large snags and ends at the beginning of a ridge between the North and South Fork of Gordon Creek that currently has prime diversity of decaying trees. Like the forests of Section 1, Section 11 has become a popular area for mushroom harvesting, the abundance of varying mushrooms depending on this very forest condition. Logging these areas will have long-lasting impacts on this and other dependent species.



Large snags in Section 3

While we appreciate the information in Table 19 (EA, 90) regarding the number of snags in the varying sections, we expect an environmental assessment to also include an analysis of how many snags will need to be removed in the process of logging, including predicted hazard snag removal. This is a direct impact to habitat in the forests and we would expect to see a more thorough examination of the wildlife reports on how the removal of this habitat will not detrimentally impact species.

At several points in the EA there is acknowledgement that snags, even large 20" diameter would have to be felled for safety. (EA 7, 64) There is also some reference to mitigation measures that would keep the operations from having too much of an impact on the snags and CWD in the project area. Yet, "observations of the project area indicate that most of the snags larger than 15 inches diameter are not hazardous." (EA 64) Is the agency using this environmental assessment to implement effective mitigation measures to avoid removing snags or actually just *observing* which will be in the way of operations?

“Large snags and standing dead trees with bark attached are used variously as solitary roosts, maternity roosts, and hibernacula by these species [silver-haired bat, long-eared myotis, and long-legged myotis], and six other bat species associated with Douglas-fir forests (Christy and West 1993). Since this habitat is very rare in the project area, presence of these three species is unlikely.” (EA, 62) The analysis on bats in the Wildlife section is an example of Bark’s continuing concerns for the BLM’s lack of disclosure when it comes to the scientific reports used for reference. We would disagree with the statement that bat habitat is “very rare” in this area. While we understand that these bat species do not require extensive protection buffers, when adding up the vague conclusions such as this one, the EA becomes less of an analysis of environmental risks and concerns for logging and more of an informal checklist.

We see very little effort by the BLM to attempt to justify the felling of snags other than for hazard trees. The RMP requires retaining “snags within a timber harvest unit at levels sufficient to support species of cavity-nesting birds at 40 percent of potential population levels.” (RMP 21) The EA states that the area is already deficient of this 40% requirement. (EA 60) As well, the EA differentiates smaller snags and the 1985 Neitro study. A diversity of snags and decay class is vital to a healthy forest. Bark has concerns that the BLM is not in compliance with the RMP as it regards this issue. What measures did the BLM take to avoid the felling of snags when planning those roads that appear to put snags of varying stages and ages at risk?

CORBETT WATER

One of Bark’s biggest concerns with this timber sale is the inevitable effect it will have on the Corbett Water District. “Neither the State of Oregon, nor the water provider for the City of Corbett (correspondence, field trip), have identified water quality concerns or issues in the Gordon Creek watershed related to sediment supply, transport or turbidity levels.” (EA 37) This is incorrect.

The Corbett Water District uses slow-sand filters, an alternative treatment process involving passage of raw water through a bed of sand at low velocity resulting in substantial particulate removal by physical and biological mechanisms. These filters provide low cost and simple operation advantages for small communities in treating water. Removal of 99.9 percent Giardia cyst is one of the greatest advantages of these filters.

Even though slow-sand filters are one of the best treatment processes for a small community to choose, these filters do have some limitations. In times of high turbidity flow events, slow-sand filters could clog easily putting the public at risk of no potable water (if the community water system does not have a large enough storage supply).

These filters also do not effectively filter fertilizers and volatile organic chemicals (VOCs). With this system, sedimentation is a huge concern. The EA states, “The quantity of surface erosion with delivery of sediment during large storm events would likely drop back to current levels within three to five years” (EA 43)., “A short-term input of sediment and turbidity is expected to occur.” (EA 49) This may be a short period in the lifespan of a forest, but for a small community the costs of buying water from other communities can have long-lasting impacts on the economic stability.

We understand that the water board has some of the following concerns:

- ★ The Department of Environmental Quality (DEQ) completed a water source assessment and clearly stated that logging is CURRENTLY having an impact on Corbett’s water supply. This water source assessment also included a map that determined a Drinking Water Protection Area. The Gordon Creek timber sale proposes logging in a large portion of this area and yet there is NO reference to this protection area or the stated concerns leading to its determination anywhere in the environmental assessment.
- ★ The Corbett Water District has had over ten broken water mains in the past year due to private logging operations using the road leading to the treatment facility from the intake. The Water District has not been reimbursed for the incurred expenses from these broken mains and have concerns that these events will be replicated by the BLM in logging the Section 1 and 11 units.
- ★ The proposed 60 ft. buffers on Gordon Creek are inadequate. Just a few miles away in the Bull Run Watershed Management Unit, there are an expected 220-440 ft not-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 being concerned for actions taken by other agencies.
- ★ The Corbett Water District has an emergency plan for events that would prevent them from being able to get potable water to their residents. Increased turbidity issues in the past few years have caused the district to recommend their residents to boil water before drinking it. Their emergency plans are intended for events such as flooding, storm weather, malevolent contamination and other uncontrollable incidents. Should the Corbett Water District add logging on public lands to this list of possible events?

The Gordon Creek EA states “The proposed thinning activities would not affect public health or safety.” (EA 7) We couldn’t disagree more. In the DEQ’s *List of Potential*

Contaminant Sources the potential impacts of logging are stated as follows “Cutting and yarding of trees may contribute to increased erosion, resulting in turbidity and chemical changed in drinking water supply.” The summary brochure states the sensitive areas within the Corbett Drinking Water area include areas with high soil erosion potential and high road run-off potential at areas within 1000 ft from the creeks. How could the BLM possibly make such a blanket statement when there are such clear risks at stake? How could the BLM be in compliance with the Salem District RMP, which clearly states to “continue coordination with the Oregon Department of Environmental Quality for implementation of best management practices which protect beneficial uses of water?” (RMP 23)

“A small portion of the watershed on the south and southeast is included in the Bull Run Watershed Management Unit. For all other US Forest Service lands in the Gordon Creek Watershed, as per the Memorandum of Understanding between Mt. Hood National Forest and the Corbett Water District, the principal and most important use is municipal water supply.” (Gordon Creek WA, 1-8) Why would the BLM’s proposed action be such a radical divergence from the other surrounding agency’s efforts to ensure the town of Corbett can continue to depend on their municipal water supply?

The Gordon Creek EA also identifies six ground water wells, five for domestic water use and one for the City of Corbett, located within project sections. It fails to mention whether the project would impact, potentially impact, or not impact these wells. In order to prevent any potential runoff from entering these wells, the BLM should determine whether these six wells are sealed properly. If the source of these wells comes from a confined aquifer, the BLM should identify the recharge points of the confined aquifer to ensure the project does not create an impervious surface (e.g. roads) on top of the recharge points. This information should be contained in a NEPA process.

The Salem District RMP states as a management action to “continue coordination with the Oregon Department of Environmental Quality for implementation of best management practices which protect beneficial uses of water.” (RMP 23) Based on the information, we have a hard time seeing how the BLM has complied with this action.

RIPARIAN

“The IDT evaluated the project...and determined that there is a potential for cumulative effects on water quality and fisheries”. (EA 8) Bark has concerns about the lack of investigation on what impact this project will have on important fisheries in the area. The Gordon Creek EA has information about the existence of various fish

species, but fails to include results from the Salmon Spawning Surveys that are being undertaken along the North Fork of Gordon Creek. Table 17 in the EA uses data from streamnet.org, but there is no reference to a field check of the current status of these fish barriers. When looking at Endangered Species such as Lower Columbia steelhead trout, using this online resource would be a starting point and then field follow up would be appropriate.

The EA includes a concurrence with the National Marine Fisheries Service (NOAA). (EA 85) At this time Bark does not have a copy of the letter of concurrence, but as the BLM moves forward with this project, we expect that the consultation is determining “May Effect, Not Likely to Adversely Affect” based not only on the project harvest, but also on new roads and culverts. When the original Biological Assessment was completed, were the proposed roads included in the scope of their analysis?

As part of the Sandy River Basin Partners, we expected the BLM to be more rigorous in their examination of the presence of anadromous fish species. Bark is in full agreement with the Portland Water Bureau that this thinning project could be at odds with efforts to create protection plans for the winter steelhead and coho salmon. As stated in comments submitted by the PWB: “...the entire length of Gordon Creek up to the confluence of North Fork and South Fork in Section 11 is current habitat for Lower Columbia River coho and winter steelhead. This section of the FONSI states that the nearest habitat for Lower Columbia River Chinook is approximately five miles downstream of the project, but doesn’t acknowledge that there is current steelhead and coho habitat within and immediately downstream of the thinning units. The Streamnet GIS database that BLM relied on to delineate the location of ESA-listed fish habitat in the project area is not an accurate resource for this purpose.”

The Gordon Creek EA states that the proposed action’s disturbance is expected to be temporary, yet the EA state that sediment increases could continue for 3-5 years. (EA 9)

The Gordon Creek EA claims that this project is in compliance with the Aquatic Conservation Strategy (ACS). Complying with the ACS objectives requires agencies to manage riparian-dependent resources to maintain the existing condition or implement actions to restore conditions. (NWFP S&G, B-10). In *Pacific Coast Federation of Fishermen's Associations v. NMFS*, (W.D. Wash. 1998) (“PCFFA I”) the court held: “Before a project can proceed, USFS and BLM must find that actions either meet, or do not prevent attainment of, the ACS objectives. The finding must be supported by an analysis of how the proposed management action will maintain the existing condition or restore it.” *Id.* at 12. The EA does not provide a sufficient analysis to support a finding that logging in the riparian reserves will either maintain existing conditions or restore it. Although the EA acknowledges some short-term adverse impacts to water quality, it simplistically concludes logging in the Riparian Reserves would “add a

greater degree horizontal complexity to these stands.” (EA 63) This is not adequate evaluation to ensure that the timber sale attains ACS objectives.

Gordon Creek is listed as a possible fish enhancement project in the Salem District RMP. (RMP 28) Why is there no mention of this in the Gordon Creek EA? Wouldn't logging with such weak buffers along the streams potentially conflict with such a project?

ROADS

Bark is strongly opposed to the building of new roads anywhere in the Mt. Hood area. Thousands of miles of logging roads already criss-cross our landscape and watershed, causing immeasurable damage every year we continue to evade the inevitable mass decommissioning. When agencies come out with projects that include new road-building, we are immediately skeptical of any restorative intentions that may be intended. How could restoration possibly 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.

Sixty-five miles of roads already exists in the Gordon Creek watershed and approximately 25% of the roads are within 200 feet of a stream. (Gordon Creek WA 1-8) The Salem District RMP states, “Reduce road density by closing minor collector and local roads in areas or watersheds where water quality degradation, big game harassment, or other road-related resource problems have been identified.” (RMP 64) As DEQ has clearly shown that there are issues with water quality, how is the BLM in compliance with the RMP, by not only leaving out a clear plan to reduce the road density but also proposing six miles of additional roads to the system?

The Gordon Creek EA makes no mention of conclusive plans to decommission roads once logging has been completed. The historical reference to past logging roads and railroads in the area, still in existence almost a hundred years later, should be a clear signal for planners to the reality that roads do not easily go away on their own. They continue to have impacts on the forest for decades after their use. The Salem District LRMP objectives are clear; “develop and maintain a transportation system that serves the needs of users in an environmentally sound manner.” (Salem District RMP 62) Two prime examples of the BLM's divergence from this objective are the road renovation in the northern part of Section 1 and the proposed use of the old railroad tracks in Section 11.

Section 1

The road that leads from E. Larch Mountain Road into Section 1 currently trails off where it meets up with the North Fork of Gordon Creek just north of the timber sale

units. The preferred alternative, as well as Alternative 3 includes a proposal to renovate this sufficiently decommissioned road, but also add a temporary stream crossing where one currently does not exist. There are still several logs and old road ties creating a passable pedestrian bridge. In the past several months, mushroom gatherers have been observed using the old road as a trail up into the forest. The eastern bank of the creek is at the bottom of a considerably steep slope and the road renovation would be occurring for approximately a quarter of a mile within 50 ft. of the stream. This new stream crossing would be impacting stream passage within a mile of the Corbett Water District's intake facility. The EA states on page 57 that "new roads would be located and designed so that any resulting runoff would infiltrate rapidly into adjacent, undisturbed soils, well away from riparian areas." How could that possibly occur with regards to this road construction scenario?

In addition the Salem District RMP Best Management Practices guides the agency in the design of stream crossings by stating, "Bottomless arch culverts and bridges will be necessary in some instances where...(the) value of the fishery resource dictate that special engineering considerations are necessary to ensure uninterrupted fish passage." (Salem District RMP Appendix C-4) Because there was nothing conclusive in the EA about the results of the Salmon Spawning Surveys in place along the North Fork of Gordon Creek (one within less than a half of a mile) and there are known coho salmon in this stream system, we can assume that the agency will not be opting for a round culvert should this action take place.

Section 11

The use of the old railroad beds is unclear by the maps and the flagging in the forest, however, it does appear that hauling would occur on portions of these old beds. "There are railroad grades throughout the project area, many with extensive cut-and-fill roadbeds and through-cuts, often 15-20 feet deep." (EA 30) Within the large ditch-like cuts through the forest, tree growth is almost nonexistent. Continued impact through their use would lead to considerable risk for the forest. Their steep banks could lead to major erosion problems and a lack of runoff relief options would force drainage to happen on the roadbed by rutting.

"Eight miles of new road surfaces is an increase by 12% in the watershed as a whole." (EA 57) "The extent of compacted/disturbed soil surfaces in the Gordon Creek watershed as a whole was not estimated and a "cumulative" total has not been determined. At the conclusion of the project the quantity of compacted/disturbed soils would begin to decrease over time from the maximum and would approach current levels within a decade as soil surfaces recover." (EA 58)

This is preposterous. Within the project area itself, there are examples to refute this claim that the roads will begin to approach current levels in under a decade.

Additionally, how does the BLM justify adding to the road system by 12% and not do any analysis of the cumulative total effect it will have on the watershed?

About 0.4 miles of new road will occur adjacent to the Bull Run water-supply drainage boundary. It's not clear what the prescription will be for these particular roads once the thinning is completed, i.e., whether they would be decommissioned or left in place -- and if they are decommissioned, what specific treatments would be undertaken. Given the fact that BLM's law enforcement staff for the Salem District already face significant challenges in being able to conduct security patrols on BLM lands within and adjacent to Bull Run Management Unit, Bark is concerned about the added security challenges posed by constructing new access roads in areas that are within a few hundred feet of the Bull Run boundary, particularly with regards to off-highway vehicles.

The BLM does not make mention of the Transportation Management Plan required of the district in the Salem District RMP. (RMP 12) Is the new road-building in compliance with this plan?

SENSITIVE SPECIES

The EA describes a presence of several Special Status Species in the Project Area, including many adjacent to units. (EA 46,47) However, it is unclear how close the presence is to the units. As well, there are known species within the project area, however it is unclear where in each of the units these discoveries were made. How was the BLM able to make a determination that these imperiled species would not be impacted? For instance, there is known population of the Columbia dusksnail adjacent to Section 3A. Yet, the design of unit 3A has a keyhole shape on the west side of the unit. Is this where the dusksnail was found? If so, this would infer that the species would be *surrounded* by logging, even if it would not be in an actual unit. We have witnessed a continual impact beyond the unit boundaries in post-logging areas, consisting of tree windthrow, erosion, introduced off-highway vehicle entrance into the forest and other ramifications of logging.

SOIL

Table 8 (EA 55) describes slopes over 50%, but does not actually show where those slopes are located. A 50% slope is a significantly riskier operation, even with a helicopter hauling option. As well, the EA states "Slopes in the project area seldom exceed 35 percent. Steeper grades have lower infiltration capacity and structural stability. Where slopes approach 50 percent or steeper, erosion potential is moderate to severe." (EA 55) Where in the EA does the BLM discuss what measures will be taken to mitigate this severe potential? As well, what does "seldom" imply? Table 8 refers to

0-20% slope, 20-50% slope and 50+ slope. There is no way for the reader to know how much of the 30% of the project that exists at a slope of 20-50% is actually above 35%. If 7% is over 50%, as the table shows, and there is an additional percentage over 35%, than we would disagree with this use of the term seldom. Table 8 is comprised by Digital Elevation Model (DEM). When the BLM does not better extrapolate from these computer modeling programs and match the data with on-site data collection, we



Steep slope in Section 1

become skeptical of the agency's claims to know what is actually on the ground.

The EA discusses the results of the Water Erosion Prediction Project (WEPP) modeling. However, the EA does not indicate how or where in the project the testing took place. Due to the steep slopes at various parts of the proposed area, in particular Section 1 and parts of the north banks of Gordon Creek in Section 11, Bark has concerns that this modeling is not rigorous

enough to predict the true risk of logging on slopes. The EA claims that sedimentation will occur within the first year and will return to current stability within the next three to five years. (EA 56) How does WEPP modeling account for the impacts to the environment caused by the activity that will occur in the next five years? Please provide more information about the WEPP modeling process and how the results were assessed.

CUMULATIVE IMPACTS

The Gordon Creek Timber Sale is surrounded by private industrial logging. NEPA requires that the BLM analyze the cumulative impacts, "which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future projects" either federal, local or private. (40 C.F.R. § 1508.7) The EA states that the Gordon Creek Timber Sale is in the Lower Sandy River fifth field watershed. (EA 6) To our knowledge a watershed analysis for this watershed does not exist, which therefore has led the BLM to refer to the Gordon Creek Watershed Analysis at the sixth field level. The BLM acknowledges the presence of such large entities as Longview Fibre in the area, however Bark does not see the scope of this watershed providing an adequate area for analysis of the cumulative impacts, with regards to other impacts on this area. With known endangered species present so

close to this project area, we urge the BLM to incorporate more information about the impacts from and on the Lower Sandy Basin as it relates to this project.

Thank you for accepting our comments. Please call if you have further questions.



Adjacent private lands

Sincerely,

Amy Harwood
Program Director