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Edward W. Shepard, State Director
Bureau of Land Management
PO Box 2965
Portland, OR 97208

January 10, 2008

RE: Western Oregon Plan Revision

Dear Mr. Shepard:

Molalla RiverWatch has reviewed the Draft Environmental Impact Statement for the Revision of the Western Oregon Management Plan and supports the No Action Alternative. We have concerns about the other three alternatives that are general and region-wide as well as more specific local concerns. Although we recognize the need for timber harvest, the emphasis on public lands should be on thinning young stands rather than regeneration (clear cut) harvest and old-growth cutting.

The WOPR plan heavily emphasizes increased timber harvest at the expense of water quality, recreation, and fish and wildlife including protected species. Molalla RiverWatch believes that the plan will not meet the test of scientific and peer review and, if approved, will result in lengthy and costly litigation. The Northwest Forest Plan is working to protect our public resources and should not be abandoned or modified.

THINNING VS. CLEAR CUTTING

There is wide-spread public support for thinning of young crowded stands of timber. Polls have shown, however, that a substantial majority of Americans oppose cutting old-growth forests. All of the three alternatives call for huge increases in regeneration harvesting and only modest increases in thinning harvests. Molalla RiverWatch believes that the BLM should follow examples set by the US Forest Service in the Siuslaw National Forest. Environmental groups and timber managers agreed on a plan to increase thinning harvest levels to reduce fire danger and protect other resources while maintaining total harvest levels consistent with other national forests. None of these timber sales have been challenged in court.

GREEN TREE RETENTION

The No Action Alternative calls for 6 - 8 trees per acre after regeneration harvest and 12 - 18 trees per acre in connectivity diversity blocks. Alternatives 1 and 2 call for no green trees per acre. Green trees are important wildlife habitat and should not be eliminated.

RIPARIAN RESERVES

The WOPR states that drastic reduction of riparian reserves will not have a negative impact on water quality and fish and wildlife protection. The DEIS Summary of Environmental Consequences (LVII) states “The habitat needs of aquatic- and riparian-associated species along intermittent streams would be met under the No Action Alternative and Alternative 1, but would not be met under Alternative 2 and 3”. Under the BLM’s preferred Alternative 2, the acreage in riparian management areas will be one-fourth the acreage of the No Action Alternative and may result in an inability to meet protection standards such as DEQ’s TMDL standards for water temperature and sedimentation, or the EPA Clean Water Act. The Molalla River is listed on the DEQ’s 303(d) list of impaired streams for temperature. Molalla RiverWatch is working on restoration projects to lower water temperature in the Molalla River and its tributaries. The BLM should do the same and not lower standards that may have negative impacts on water quality and ESA listed species.

SPOTTED OWL HABITAT

Alternatives 1 and 2 are based on the Draft Spotted Owl Recovery Plan that has recently failed scientific review. The No Action Alternative would provide the best protection for spotted owls by maintaining owl activity centers and critical habitat protection.

INVASIVE PLANTS

The DEIS Pg.614 shows that susceptibility for the introduction of invasive species associated with timber harvesting would be highest for Alternative 2 and that Alternatives 1 and 3 would also create a higher susceptibility than the No Action Alternative. Invasive species such as Scotch Broom and Himalayan Blackberries are a problem in the Molalla River Corridor. Eradicating higher levels of invasive plants will be expensive to taxpayers and offset some of the economic benefits of timber harvest.

CLIMATE CHANGE

The DEIS does not consider impacts from global warming. Page 491 of the Plan Revision states “The analysis assumes no change in climate conditions, because the specific nature of regional climate change over the next decade remains speculative”. Although the exact impacts from climate change may be hard to predict, scientists overwhelmingly agree that global warming is a reality and should not be ignored.

Climate change may have a negative impact on water temperatures, may exacerbate fire danger, and may change plant species common to our area.

An article in the Sunday Oregonian dated January 6, 2008, “Warming Could Fry Salmon”, discusses impacts from global warming on endangered fish. The opening sentence states “Salmon survived massive dams and fishing fleets but now they are feeling the heat of global warming – and its likely to hammer them as hard as anything they’ve faced...Biologists who have spent their careers watching over the fish said temperatures expected to rise an average of 0.2 to 1 degree per decade over the next century will probably wipe out some fragile runs of salmon”.

The BLM should consider best-known science practices in formulating a management plan. Regeneration harvesting opens large tracts of land to the warming effects of the sun and reduces the number of conifer trees that remove large amounts of carbon dioxide from the atmosphere.

FIRE SEVERITY AND HAZARD

The DEIS Pg. 768 shows that the No Action Alternative will reduce fire severity and hazard the most over the next 100 years. Alternative 2 will produce the least reduction in fire severity and hazard. The table on Page 768 of the DEIS would be much more meaningful if the fire severity figures were estimated for 2016 and 2026. The WOPR is not a 100-year plan and should include information relevant to the expected life of the plan. With high regeneration harvest levels planned for the next ten years, there will certainly be short-term changes to the fire severity and hazard that are not reflected in the table. Clear cutting and young regeneration stands increase fire risk whereas proper thinning practices decrease fire danger. Global climate change resulting in warmer and dryer summers will produce larger and hotter forest fires. It is very critical that we manage our public forests in order to produce the lowest possible hazard and minimize the huge costs of fighting fires and loss of forest and property resources. Current best forest management practices are endorsing fire as a management tool in reducing catastrophic fires. Science has shown that some fires are beneficial in promoting long-term forest health and should be allowed to burn. The DEIS calls for suppressing all fires rather than following best management practices.

AIR POLLUTION

The DEIS Pg. 773 states “Prescribed burning for the purposes of hazardous fuels treatment and site preparation is the only management action under the alternatives that would have a notable effect on air quality”. We would argue that harvest levels under the different alternatives will have an effect on forest fire severity and intensity and will therefore decrease air quality under the preferred alternative. Alternative 2 is expected to be the least protective of air quality due to prescribed burning emissions from timber harvesting activities in the northern districts within the planning area. The DEIS Pg. 773 predicts that PM10 emissions for Alternative 2 will be 7,414 tons per year, more than twice the 3,443 tons per year for the No Action Alternative. Increasing carbon pollution will negatively impact global warming as well as the air quality and health of local residents.

SOCIO-ECONOMIC BENEFITS

The DEIS discusses at length the economic benefits from timber harvesting but fails to adequately address economic benefits associated with clean water, fish and wildlife, and recreation. Economic studies have shown that the timber value is a small percentage of the total forest value.

WILDERNESS CHARACTERISTICS

The DEIS Pg. 113 states that lands maintained for their wilderness characteristics would be 63% under the No Action Alternative and 52% under Alternative 2. Four of these areas are within the Salem District. With the ever-expanding interest in outdoor recreation and wilderness hiking and backpacking, all areas suitable for protection should be managed as wilderness. DEIS Pg. 785 states that management to maintain wilderness characteristics would not apply to portions of the units suitable for timber production. Timber harvesting is not compatible with management for wilderness characteristics and should not be allowed.

VISUAL RESOURCE MANAGEMENT

Management for visual resources under Alternative 2 would decrease from a present 73% to 55% for Class II and would decrease from 69% to 43% for Class III. Natural landscapes are an important resource and should be maintained as such.

SOURCE WATER WATERSHEDS FOR PUBLIC WATER SYSTEMS

The Molalla River is the drinking water source for the cities of Molalla and Canby. The actual population of Molalla is 7,195 residents, not the 3100 residents stated on page I-1125 of the DEIS by the BLM. The same table lists the BLM acreage and the other acres in the watershed for each city. For Canby, the table lists 2892 BLM acres and 84,687 other acres. For Molalla, the listing is 43,125 BLM acres and 86,867 other acres. Since Canby is downstream from Molalla, the acreage for Canby cannot possibly be less than for Molalla. In fact, the Canby drinking water figure should include the Milk Creek Watershed. Since the Milk Creek Watershed includes BLM land, both acreages should be substantially higher for Canby than for Molalla. It is imperative that the drinking water quality be maintained to provide for rapidly growing needs.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

Under the No Action Alternative, all 94 existing areas of critical environmental concern would continue to be designated. Special management and attention would continue to be implemented in these areas. Under Alternative 2, 31 of these areas would not be designated. Molalla RiverWatch is concerned about the loss of the ACEC designation for Wilhoit Springs and Williams Lake under all three alternatives. We are also concerned about the loss of the Valley of the Giants under Alternative 3. Molalla Meadows is listed as a potential ACEC and it should be protected as such. For the Molalla Meadows, however, all three alternatives state that the meadows would be protected without O & C timber harvest base acres. It is our understanding that the Molalla Meadows are within the Molalla River Recreation Corridor and that those lands are public domain land, not O & C land.

Molalla RiverWatch would like to see the entire Molalla River Recreation Corridor designated an area of critical environmental concern. The narrow public lands corridor along the river acts as a buffer from private lands in the bulk of the upper watershed that are scheduled for heavy harvest activity during the next decade. NOAA has indicated that they consider the Molalla River critical in restoring salmon and steelhead runs for the Willamette River Watershed. The Aquila Vista Environmental Education and Research Area should certainly be protected as an ACEC and should also be designated a research area as stated on the Aquila Vista sign, "Aquila Vista Environmental Education and Research Area". The entire Recreation Corridor and the Molalla River are heavily used for recreational purposes. Logging is not compatible with these uses.

WILD AND SCENIC RECREATION DESIGNATION

Molalla RiverWatch is currently working on Wild and Scenic status for the Molalla River above the Glen Avon Bridge. The BLM has determined that the area is eligible for Wild and Scenic status. The Molalla River Recreation Corridor should be managed accordingly. Molalla RiverWatch will also seek Oregon State Scenic Waterway designation for the Molalla River to join the other rivers listed on page 145 of the DEIS.

POTENTIAL BACKCOUNTRY BYWAY

Table 50, Pg. 136, lists no potential backcountry byways in the Salem District. The Molalla Forest Road through the Molalla River Recreation Corridor should be considered.

OFF-HIGHWAY VEHICLES

The BLM WOPR places a high priority on expanding off-highway vehicle use as compared to non-motorized recreation use. Studies have shown that non-motorized recreation is increasing at a much higher rate than motorized OHV use. The BLM plan includes very little

discussion of non-motorized recreation expansion. In fact, the table on Pg. 140 of the DEIS states that the Molalla River non-motorized trail system will shrink from 3132 acres under the No Action Alternative to 2692 acres under all action alternatives. Molalla RiverWatch is very concerned about losing a large chunk of our non-motorized trail system.

RECREATION SITES

The table on Page 123 of the DEIS listing recreation sites lists the three acres of Hardy Creek Trailhead as a recreation site. Actually, the entire trail system is a recreation site, not just the parking lot and should be listed as such. The entire Wildwood day use area of 556 acres is listed as a recreation site, not just the parking lot. We deserve equal treatment for the Molalla Trail System. Page 63 lists areas eligible for administrative withdrawal from the harvest land base. Recreation sites such as trails are listed as eligible sites for withdrawal. The Molalla River Recreation Corridor should be withdrawn from the harvest land base.

POTENTIAL RECREATION TRAILS

Page 142, table 48, of the DEIS lists potential recreation trails including a Molalla trails expansion of 2.5 miles. Molalla RiverWatch and the BLM have been discussing a larger expansion for at least ten years. One planned trail would connect South Rim Trail with Aquila Vista, a distance of 2-3 miles. Another longer trail link would connect the Quarry Creek to Gawley Creek trail to Horse Creek and eventually on to the Table Rock Wilderness. In fact, during the late 1990's, work crews had completed approximately one mile of trail beyond the Gawley Creek ford, when the BLM discovered that they had not done an environmental assessment for that trail section. Molalla RiverWatch was told that we could complete the trail as soon as an EA was completed but that assessment has yet to be done. Both of these planned connecting trails will be important additions to the trail system, linking the Hardy Creek area to the Table Rock Wilderness area and should be included in the planning process.

We cannot continue a short-sighted relationship with our natural resources. Oil is running out, water is scarce, and species are becoming extinct at an alarming rate, yet we allow finances to dictate public policy that exacerbates this process of extermination and deterioration of our natural resources. The No Action Alternative is the alternative that best preserves our precious forest resources. Molalla RiverWatch requests that the BLM adopt the No Action Alternative as their Western Oregon Management Plan.

Sincerely



Bill Taylor, President
Molalla RiverWatch, Inc.