



July 16, 2019

Jonathan Tucker  
Middle Fork Ranger District Planner  
46375 Highway 58  
Westfir, OR 97492

**Re: Youngs Rock Rigdon Project - Scoping**

Dear Mr. Tucker,

WildEarth Guardians respectfully submits these comments to the U.S. Forest Service in response to the agency’s scoping notice letter for the proposed Youngs Rock Rigdon Project. The project includes a broad swath of actions that aim to improve desired conditions. Actions include:

- 4,500 acres of variable density thinning and regeneration harvest;
- 160 miles of road treated and maintained including 8 miles of new temporary road spurs; constructed & decommissioned, 4 miles of non-system roads improved & decommissioned, 60 miles of system roads closed and stored, and 12 miles decommissioned;
- 1,200 acres hazardous understory treated to reduce fuels;
- 700 acres of floodplain/riparian reserves activities;
- 300 acres of meadow restored; and
- various recreation-related actions.

The project is located 15 miles south of Oakridge, OR in the Buck Creek and Echo Creek subwatersheds, which drain to the Middle Fork Willamette River. Both of these subwatersheds are “functioning at risk” according to the Watershed Condition Framework, thus factors impacting the health of these watersheds should be addressed.

WildEarth Guardians is a nonprofit conservation organization with offices in Washington, Oregon and five other states. WildEarth Guardians has more than 230,000 members and supporters across the United States and works to protect and restore wildlife, wild places, wild rivers, and the health of the American West. WildEarth Guardians and its members have specific interests in the health and resilience of public lands and waterways. Please add our name and organization to the contact list to receive any future public notices regarding this project and please use standard mail (not certified) if sending items via the Postal Service.

We are pleased to see the Willamette National Forest continue its efforts in the Middle Fork Ranger District with the goal of moving the forest closer to meeting its desired conditions. We understand that capacity and budgets are limited, which means that a holistic approach that incorporates terrestrial, aquatic and recreational needs through this environmental analysis makes sense.

Given the threats from a changing climate, the very high risk of Upper Willamette Chinook salmon extinction, and the 303(d) listed water bodies in this area in violation of the Clean Water Act, we are particularly interested in the project components that address water quality, aquatic habitat, improve watersheds and ensures forest resiliency. Identifying a “sustainable road system” – listed as one of the five purposes of this project – has the potential to lead to improved watershed conditions while also improving access to trails, campgrounds, fishing areas, etc.

**1. As part of the analysis of the Youngs Rock Ridge Project under NEPA, we expect the Willamette National Forest to use its Sustainable Roads Strategy, updated information and field verification to identify the Minimum Road System and identify unneeded roads for decommissioning or other uses.**

We appreciate the previous efforts the Middle Fork Ranger District has done to analyze the specific road system in a project area, incorporate the Sustainable Roads Strategy and move forward with Subpart A of the Travel Management Rule, which includes identifying the minimum road system. We urge the project team to consider what is really needed as the minimum road system to:

- “meet resource and other management objectives adopted in the relevant land and resource management plan”;
- “meet applicable statutory and regulatory requirements”;
- “reflect long-term funding expectations”; and
- “ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.” 36 C.F.R. §212.5(b)(1).

In the draft Environmental Impact Statement, we expect to see further analysis done with regards to these road actions to ensure they meet the objectives of the minimum road system (see bullets above). Other projects in this District have included useful maps and tables that provide an overview of the current system and need and the proposed system and improvement. In addition, we are interested to know whether the proposed actions will make a difference on the ground and in management. Will the reduction in system miles “reflect long-term funding expectations”? Does a 12 mile reduction in the road system allow you to maintain the remaining 148 miles with your current roads budget? Do the road maintenance and reconstruction activities proposed minimize adverse environmental impacts? Are the aquatic risks identified with ALL the roads in this project area addressed with these road-related actions? If so, how? Why are there not more roads identified for decommissioning? How is road density impacting aquatic and terrestrial wildlife? Given the major cuts in road maintenance funds over the last decade, how does the agency prioritize recreational access roads for maintenance versus timber access roads?

The Forest Service has limited capacity to complete NEPA multiple times in a watershed, thus we ask that the agency really take a hard look at all of the roads that are being considered in this project area and identify a minimum road system that is ecologically, economically and socially sustainable. An excessively large road-system is a financial liability for an agency that continues to see its budget reduced by Congress. Even when a road is not-driveable, it still remains a liability to the agency. This is why it’s extremely important to focus limited maintenance dollars towards roads that people use for access and decommission roads that are no longer needed and causing harm to natural resources.

## 2. The Forest Service has a duty to ensure water quality and salmon habitat are protected.

We realize this is scoping but we would be remiss if we did not acknowledge the vital role that National Forests play in ensuring rivers and streams remain clean, cold and are adequately protected. The agency was created, in part, to protect our Nation's water supply. The Forest Service also has a responsibility to ensure the recovery of species that are listed as threatened/endangered via the Endangered Species Act, which includes Upper Willamette Chinook salmon, which are at very high risk of extinction in this area. We support actions that improve passage so fish can migrate up/down stream unimpaired – particularly undersized culverts. With a changing climate, and the science we do know about changes in local conditions, the agency has a duty to ensure that new culverts are large enough to not only ensure fish passage but will also handle higher flow events. Colder refugia in streams will also become increasingly important so it is vital that riparian reserves be protected and any potential impacts to water and salmon be thoroughly analyzed and avoided. This area has a water clean-up plan (Middle Fork Willamette Subbasin TMDL, 2006) due to water quality impairments (exceeding the water temperature criteria). Project actions should not only avoid further impacts to salmon and water quality, but should be developed to be inline with existing salmon recovery plans and TMDL's.

Sediment delivery to streams is one of the key contributing factors that impact aquatics. The Forest Service has developed a Geomorphic Road Assessment and Inventory Package (GRAIP) which can help pinpoint locations of sediment delivery to streams. We encourage the Forest Service to use this type of tool to compare differences between project alternatives to better understand potential improvements across the landscape.

### Conclusion

As conservationists and visitors to the Willamette National Forest, we use the roads and trails but also recognize the harm that aging and unmaintained roads cause. The Forest Service's current road system is oversized for current uses, unaffordable with current budgets and causing significant harm to wildlife and aquatic species (such as Chinook salmon). In addition, unmaintained roads are impacting access when storms destroy roads. A road system that is too large for current budgets can lead to unplanned road closures, often to key recreational destinations, because of lack of road maintenance.

We are pleased to see that you recognize this need and include it as one of the purposes for this project. The actions proposed and decided upon will chart the direction of this watershed for years thus we strongly encourage you to do this well.

If you have questions, please contact me.  
Sincerely,



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