



September 16, 2019

Willamette National Forest – Detroit Ranger District
Attn: District Ranger David Halemeier
HC 73 Box 320
Mill City, OR 97360

Re: Dry Beard Project – Draft EA

Dear District Ranger Halemeier,

WildEarth Guardians respectfully submits these comments to the U.S. Forest Service in response to the agency's Draft Environmental Assessment (Draft EA) for the proposed 10,697 acre Dry Beard Project located in the headwaters of the North Santiam and Upper North Santiam watersheds – just east and southeast of the Detroit Reservoir.

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 and enjoy accessing, recreating and visiting national forests. We commented on the project scoping notice in August of 2018.

As it currently stands, the Draft EA states that the project purpose is:

- “to contribute to a predictable, sustainable supply of timber and other forest products to maintain the stability of local and regional economies;
- actively manage stands and Riparian Reserves to improve stand conditions, density, diversity, and structure;
- sustainably manage the network of road systems in the project area; and
- replace or repair the Idanha Bridge” (Willamette National Forest, Dry Beard Project Draft EA, August 2019, p.7).

The actions proposed to meet the project purpose include:

- harvest 24 million board feet on 1,079 acres, leaving 260 acres of skips – across 1,339 acres
- construct 2.2 miles of new temporary spur roads and re-open 2.5 miles of existing spur roads
- maintain/reconstruct 40 miles of system roads for hauling timber
- decommission 2.6 miles of system road, store 1.8 miles of system road and remove 0.9 miles of road on private land from the USFS road database
- replace or repair the Idanha Bridge. (Draft EA, p. 8)

In particular, we are interested in the project components that address water quality, aquatic habitat, improve watersheds and ensures forest resiliency in a changing climate. USFS Region 6 has the distinction of being burdened with 25% of the entire Forest Service road system, with Oregon national forests criss-crossed by nearly 70,000 miles of forest roads. Nearly 80% of watersheds in Oregon national forests are impacted by roads and trails, according to the USFS Watershed Condition Framework. Yet the solution – identifying and implementing a minimum road system – becomes less of a priority. We know that it is possible to improve watershed conditions while also improving access to recreation sites and private homes, but it requires a true commitment and thoughtful planning.

We are pleased to see the Willamette National Forest use their Road Investment Strategy as a starting point for moving towards one of the project purposes- to sustainably manage the road system. It is also good to read that roads were surveyed in the field to confirm aquatic risk and the GRAIP lite model was used. After all of this analysis of the 83 miles of road in the project area, only 4.5 miles of system roads was identified to be stored or decommissioned. This 3% reduction in the road system (counting only the decommissioned roads, since stored roads often do still need a bit of maintenance), we have to ask whether this truly meets the project purpose of “sustainably managing the road system”? We had several questions in our scoping comments (Guardians comments, August 2018, p. 2) that were not answered along this line of questioning. How will the remaining 80.4 miles be maintained with your average road budget and current maintenance backlog? We also asked:

- What is the net improvement on the ground that really meets the project purpose of “sustainably managing the road network”?
- How long post-construction will temporary roads be open before they are decommissioned?
- Are the aquatic risks identified with these project roads in the Willamette’s Road Investment Strategy addressed with these road-related actions? If so, how? (i.e. the Draft EA states that the roads proposed to be decommissioned are high aquatic risks but what about the other high aquatic risk roads?)
- The road maintenance work seems to indicate basic road maintenance to meet public safety and user objectives, which is vitally important, but what about water quality objectives?

On page 18, you state that the 2.6 miles of road proposed to be decommissioned are “considered high aquatic risk and some are not drivable due to various landslides, washouts, and overgrown vegetation” (Draft EA, p. 28). These are precisely the type of road that should be decommissioned. Further in the Draft EA, it is stated that project activities will: “...increase annual road generated sediment delivery to streams in the project area by 252 cubic yards during project implementation and decrease it by 40 cubic yards in the long-term” (Draft EA, p. 92). A 200% increase during project implementation and 44% decrease over the long-term (Draft EA, p. 105). The 19 culverts installed/replaced or removed would ensure that 4,750 cubic yards of fill was stabilized (Draft EA, p. 104). This implies that though there will be an increase in sediment during the 10 years that the project is implemented, at a future date, the sediment inputs will be less. Will this result in a net gain?

The draft EA made reference to a travel and road management plan for the project area but none was available on the project website when these comments were drafted. It seems that there was a lot of work put into the analysis of the road system, the sediment loads and the aquatic risks. However, when we also see statements that say “post project, road densities improve slightly but still

have a negative impact on the watersheds” (Draft EA, p.101), we have to ask whether the road actions proposed really match what the analysis says is needed in this area. There are 25 miles of system roads that are currently closed in this project area (Draft EA, p. 124). Are they all needed in the future, which is why they were not included to be decommissioned? Or are they already hydrologically stabilized with vegetation growing on the road bed and would add little benefit to wildlife and/or aquatic systems and/or soil health with further treatment?

We appreciate the attempt to minimize temporary road construction and the avoidance of temporary roads in riparian reserves. Though, it is still disappointing to see that slightly more temporary road mileage (4.7) is incorporated into the project proposal than system road closure or decommission actions (4.4). We also understand that there are many unauthorized roads in the project area that will be addressed. These unauthorized roads can have a significant impact on a watershed so we appreciate your efforts in undoing the damage as you move forward with implementation.

Again, to reiterate, we appreciate the use of the RIS, GRAIP-lite, field analysis, and the interdisciplinary approach for the road system. It sounds like a lot of information and analysis was brought into the conversation. Our question is simply whether the very small mileage of proposed road actions is enough to meet the project purpose. And whether this is truly the minimum road system for this area especially whether it “reflects long-term funding expectations” (36 C.F.R. §212.5(b)(1)).

The Willamette National Forest has made great progress in recognizing the need to sustainably manage the road network, by moving forward with the RIS and incorporating roads into project proposals. This is even more important especially now as the deferred maintenance liability and costs grow and the budgets don’t keep up with the need. We believe it is possible to identify and implement a minimum road system that ensures reliable access, restores and protects aquatic systems and wildlife habitat, is resilient to climate change and is more in-line with budgets. Because these actions will dictate the direction of this watershed for decades, we are seeking assurance that the actions and final decision are adequate enough to meet the project purposes.

If you have questions, please contact me.
Sincerely,



Marlies Wierenga
Pacific NW Conservation Manager
WildEarth Guardians
80 SE Washington St., Suite 210
Portland, OR 97214
mwierenga@wildearthguardians.org
503.278.0669