



# Native Fish Society

PO Box 568  
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*Fighting for the Future of Native Fish*

Conserving biological diversity of native fish and protecting their habitats

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August 13, 2009

US Department of the Interior  
Bureau of Land Management  
Jay Carlson, District Manager  
BLM Roseburg District  
777 NW Garden Valley Blvd.  
Roseburg, OR 97470

RE: BLM Susan Creek/ Tioga Bridge Project Environmental Assessment

Comments by Rob Bowler, North Umpqua River Steward, Native Fish Society, whose numerous members throughout the Northwest are familiar with the outstanding and remarkable values of the North Umpqua River.

## INTRODUCTION

The Environmental Assessment of the Tioga Bridge and Susan Creek Day Use Area improvements is flawed by mistakes, assumptions, contradictions and lack of information especially on costs. A general figure of three million dollars has been discussed, but no specific amounts for any component are stated in the Environmental Assessment. Considering the financial situation that the US Government and the State of Oregon are facing, with a major recession and huge deficits, this project should be immediately shelved, and thus I strongly urge BLM to adopt the No Action Alternative for all the components of this project.

Building a foot and equestrian bridge, a trail extension and a new parking area is a waste of taxpayer's dollars (both Federal and State) and should not be a high priority at this time. The money slated for this project should be focused on higher priority projects that benefit a majority of people. The Tioga Project benefits a small group of serious and accomplished hikers, mountain bikers and equestrians. Furthermore, the negative environmental impacts of all components of the project are understated in the Environmental Assessment. This project is inconsistent and violates the Northwest Forest Plan Aquatic Conservation Strategy, the Wild and Scenic River Management Plan and the BLM Visual Resource Management Plan. The BLM Visual Resource Management Plan states:

“Activities may be seen but should not attract attention of the casual observer.” Considering all the impacts of this project, BLM should actually revise and extend this Environmental Assessment into an Environmental Impact Statement. Furthermore, recreation is based and dependent on the other remarkable values of this Wild and Scenic River, which are scenery, water quality and quantity, fisheries, and cultural resources. The cumulative effects of increasing use by developing more parking areas, structures, day use only areas, and campgrounds will eventually degrade the above values of the North Umpqua. The carrying capacity of this area may have already been exceeded.

#### SUSAN CREEK DAY USE PARKING EXTENSION

The current parking area is about 13,500 sq. ft. and is the largest parking area, not counting pull-offs in the Wild and Scenic corridor. There are 32 marked parking spaces. The EA states there are only 17. Use of this picnic area is light and numbers of people using the area published in the EA are inflated and are based on estimates and simulations. I strongly suggest the area of the current parking lot can be modified to include a turnaround and some parallel parking areas for vehicles with raft trailers. The area of the existing lot may have to be slightly extended or made slightly wider. The proposed loop road and parking for 19’ trucks and 28’ trailers is completely unnecessary. Riparian vegetation including removal of many trees, addition of 250 tons of new asphalt, a possibility of degradation of water quality as the loop is within the riparian zone, and overnight campers in a day use area only, are reasons that this loop road should not be a viable component.

The cost of this loop road is not even discussed, and there is no study of existing parking at the bridge site. The environmental impact of building this new parking area is understated and irresponsibly ignored. For example, it is stated in the EA that there is no possibility of pollution from runoff into the river from the new parking and loop area. But it is stated (on page 11 of the EA) “one culvert would be installed to allow drainage of water from the center of the loop during periods of very heavy precipitation”. What is actually proposed is not a culvert but a sump, which can overflow during heavy rain. So if there is a spill of some kind or a camper inadvertently releases the waste from their camper, pollution can reach the river via the sump or overflow from the sump. Of course pollutants can also leach into the river over time.

#### EMERALD TRAIL CONSTRUCTION

No action on this component should be taken until there is a complete analysis of the cultural resources in this large area. There are already two registered sites and a possibility of finding more. This flat area bisected by Susan Creek was probably an ideal location for a Native American camp or village. It will take a major archeological effort to determine the extent of the cultural resources.

“Probing” (digging small test pits) may not be sufficient. Furthermore, I would favor removing noxious plants, vegetating the meadow with native plants, and keeping the proposed trail area as natural as possible. Building a 400’ retaining wall and or moving Highway 138 to make room for a small section of trail does not solve the problem of this narrow dangerous section of trail near the proposed bridge. Hikers, mountain bikers, and equestrians would still be at risk as they face fast moving up river traffic including log trucks and semi trailer trucks. Furthermore, the building of this extremely expensive retaining wall or moving the Highway is not cost effective. The Emerald trail does not have to be constructed all the way to the bridge site, but can be considered an extension of the existing Susan Creek Campground/Susan Creek Day Use trail.

### THE TIOGA BRIDGE

1. There is adequate parking at the bridge site and parking in this area should not be reduced to accommodate the trail. (There are three large pull offs near the bridge site.)
2. The bridge itself is designed for foot traffic, emergency vehicles, and horses despite the fact that equestrians are discouraged from using the bridge to get to the North Umpqua Trail where horses are allowed. This is obviously an absurd situation and I don’t think BLM can ban horses from using the bridge. BLM needs to resolve this situation.
3. Access to the mid portion of the Tioga section of the North Umpqua Trail is one of the purposes of the Bridge. However, there is access to this section of the trail via the existing Bob Butte Road that may be BLM Road 220. There are also 12 other access points to the North Umpqua Trail. Also, to move a large crane to the south side of the river to install the bridge, a road will be constructed for this large piece of equipment. This road will then be removed. If there is a need for a rescue, why can’t this road be used for rescue? Furthermore why build the bridge at all if a cable crossing system can be installed for search and rescue and maintenance purposes? The original bridge was built for log trucks. This location is not necessarily suited for use as a pedestrian bridge.
4. ANGLER ACCESS VIA THE PROPOSED BRIDGE. Most of the Tioga trail mid section is well away from the river and or very far above the river. To say that the river is accessible for 3 - 5 miles both up and downstream from the proposed bridge site is false. Anglers would have to gain access permission from private landowners downstream of the proposed bridge site. The river is best fished from the south bank via Swiftwater or using the Mott Trail.
5. Anglers would not be able to fish the bridge site for most of the summer months if the Bridge is to be constructed.
6. Finally despite precautions, there are distinct possibilities of pollution to the river during construction especially from the in-stream work that would need to be done. A drilling rig would have to be flown to the south bank of the river to test the strength of the existing bridge piers. Despite caution, slurry from this

operation may get into the river. The EA states that 10% turbidity is acceptable. What is the 10% turbidity based on and what is the source of this anticipated turbidity if there is no chance of a supposed turbid source?

### CONCLUSION

In conclusion, I find the Tioga Environmental Assessment a P.R. Document trumpeting the supposed benefits of this grandiose boondoggle. The bottom line is a very high cost for a project of low priority, the violation of existing management plans, and the fact that the Outstanding and Remarkable values will be degraded. Maintenance of existing facilities of the Park Service, Forest Service and BLM should be a first priority. All three are well behind in maintenance and the federal credit card is 1.3 trillion in the red. BLM by proposing only two radically different alternatives should select the NO ACTION ALTERNATIVE.

Sincerely,

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