

ENVIRONMENTAL ASSESSMENT

Bedrock Campground Restoration

Middle Fork Ranger District
Willamette National Forest

March, 2004

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Executive Summary

The Middle Fork District Ranger proposes to remove approximately 250 trees killed by the 2003 Clark wildfire from the Bedrock Campground. This campground is located on Forest Road #18 about seven miles upstream of the Fall Creek Reservoir and about 14 road miles from the City of Lowell. The campground is immediately adjacent to Fall Creek and the Fall Creek trail. Various campground improvements are also proposed, including the addition of several new camp sites, widening and/or lengthening of camp site spurs, construction of new day use and trailhead parking areas, installation of four new toilet buildings, and revegetation of areas disturbed by the fire and construction activities.

The Environmental Assessment addresses the alternatives considered, environmental effects of the event, the activities needed to mitigate potential effects, and public input received relating to the proposal.

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I. INTRODUCTION TO THE PROJECT

A. Introduction and General Project Area Description:

This analysis covers a proposal to removal fire killed trees with a small timber sale and to make a number of small improvements in the Bedrock Campground. The Clark Fire, which burned in the summer of 2003, killed about half the large trees, a total of about 250, in this campground, and consumed two of the vault toilet buildings and a number of small facilities such as picnic tables. The Bedrock Campground is in sections 26 and 27, T. 18 S., R. 2 E., Willamette Meridian, as shown on the following map. It is about seven miles upstream of the Fall Creek Reservoir and is about 14 road miles from the City of Lowell. The campground is located between Fall Creek and the Fall Creek trail. The Fall Creek trail has been designated a National Recreation Trail. Elevation in the project area is approximately 1040 feet above sea level. This site occurs in an area designated as Late-Successional Reserve (LSR; Management Area 16a) which partially overlies an area designated as a Developed Recreation Site designation (Management Area 12a) by the Willamette National Forest Land and Resource Management Plan. The campground is located within the Fall Creek Special Interest Area (SIA; Management Area 5a).

The Bedrock Campground has been closed to public camping since the fire occurred. While trees posing immediate hazard to people were felled as part of the suppression effort, an immediate safety hazard does still exist, as branches of the fire-killed trees have already been breaking and falling to the ground. Some of the camp sites no longer have picnic tables or fire rings, and there are no longer adequate sanitation facilities, two other reasons not to open the campground.

The Bedrock Campground, as well as five other developed campgrounds in the Fall Creek corridor, is operated by Hoodoo Recreation Services under a concessionaire agreement with the Willamette National Forest. Hoodoo Recreation Services operates and maintains the Fall Creek campgrounds and pays a percentage of its gross receipts to the Forest.

B. Forest Service Policy and direction:

The Willamette National Forest Plan (USDA, 1990) says the Forest shall provide for a wide range of recreation opportunities compatible with management area objectives and sensitive to public demand and use (page IV-47; Forest-Wide standard and guideline FW-001). Forest-Wide standard and guideline FW-006 (page IV-47) also directs that the Forest shall provide for developed recreation opportunities throughout the Forest. Forest Plan Standards and Guidelines for recreation management in developed recreation sites (page IV-216) indicates that a safe, healthful, aesthetic, non-urban atmosphere with resource protection for the pursuit of natural resource based recreation should be provided. Forest Plan direction for management of Special Interest Areas is contained on pages IV-138 to 140. There is no specific direction relating to developed use, but the area is to be managed to result in a physical setting that meets or exceeds the Recreational Opportunity Spectrum class of Roaded Natural (MA5a-02). Overall desired conditions for the SIA is to provide a variety of examples of outstanding or unique physical, cultural or biological features; sites chosen for development will be directed toward activities of viewing and interpreting the special features of the area, and where recreation is the primary interest, management activities will be directed toward resource protection. The Bedrock Campground had been in existence for some time before the Fall Creek area was designated as a Special Interest Area.

The Bedrock Campground existed before the area was designated as a LSR. The Northwest Forest Plan (USDA/USDI, 1994) provides guidelines for management of LSRs (Record of Decision, pages C-11 through 19) but is not especially explicit regarding how developed recreation facilities within LSRs should be managed. It simply states (page C-19) “use adjustment measures such as education, use limitations, traffic control devices, or increased maintenance when dispersed or developed recreation practices retard or prevent attainment of LSR objectives”. It is not thought that the proposed actions described below would lead to a lack of LSR objective attainment. Page C-17 of the NWFP says “routine maintenance of existing facilities is expected to have less effect on current old-growth conditions than development of new facilities. Maintenance activities may include felling hazard trees along....developed areas”. An LSR assessment has been prepared for the Fall Creek Area (USDA/USDI, 1998) but contains no direction specific to this campground. It says, regarding developed recreation sites, that the scope of spatial extent is minor for individual LSRs; potential adverse impacts to late-successional stands are minimal and limited to a very small area (page 13). It also says (page 145) that expansion of existing facilities and uses and new facilities and uses should not preclude LSR and aquatic conservation strategy objectives.

The Northwest Forest Plan also contains guidelines for salvage of fire killed trees in developed recreation sites (page C-15) as follows: “removal of snags and logs may be necessary to reduce hazards to humans....in or adjacent to campgrounds. Where materials must be removed from the site, such as in a campground,....a salvage sale is appropriate”. The Fall Creek Watershed Analysis, prepared as directed by the Northwest Forest Plan, identified a general concern for the effects of developed recreation sites in riparian reserves, and specifically identifies a need for the reduction of fine sediment production within Bedrock Campground.

The Bedrock Campground is entirely within the Fall Creek riparian area as defined in the NWFP (page C-30). Standards and guidelines for recreational facilities within riparian reserves are also fairly general. Page C-34 states “for existing recreational facilities within Riparian Reserves,

evaluate and mitigate impact to assure that these do not prevent and to the extent practicable contribute to, attainment of Aquatic Conservation Strategy objectives”.

C. Document Content:

This document contains an overview of the analysis of effects of the alternative ways of achieving the following purposes and needs of the proposed action. To a large extent this document is a summary and compilation of the analyses contained in the various reports and documents contained in the Analysis File for this project, the contents of which are listed in Section VIII.

This environmental assessment is not a decision document. This document presents issues; displays the alternative strategies; evaluates proposed alternatives, including a No Action alternative; and presents analysis of environmental consequences. This analysis provides for an alternative to be selected which best meets the goals, direction, and desired future condition of the Middle Fork Ranger District infrastructure. A decision will be made and documented separately, based upon this analysis.

II. PROPOSED ACTION; PURPOSE AND NEED FOR ACTION

A. Proposed Actions:

The Middle Fork District Ranger proposes to implement the various activities below to make this campground again safe to use, to rectify the damage done by the Clark fire to various facilities in the campgrounds, and to implement some small improvements to this campground in conjunction with the fire damage repair activities. The first four items below relate to recovery of fire damage:

- Replace two vault toilet buildings destroyed by the fire;
- Replace picnic tables, fire rings, and fences damaged or destroyed by the fire or fire suppression activities;
- Remove about 250 trees killed by the Clark Fire that pose a safety concern. These would include all trees within or outside of the campground that could potentially fall into the campground or high-use areas in the vicinity. Tree that could fall into Fall Creek or Bedrock Creek but still pose a safety risk to campsites or people using Fall Creek would be felled into the creeks but not removed;
- Plant trees and manage vegetation re-growth to begin the replacement of vegetation killed by the fire to foster a quality recreational experience;
- Extend and/or widen some camp site access spurs to better accommodate trailers and motor homes;
- Add some campsites if suitable locations can be found;
- Construct a day-use parking lot (furnished with restroom facilities) to the west of road 1800.190 to reduce the disturbance of campers by people using Fall Creek for day use. This proposed parking lot site is about 400 feet east of the campground entrance;
- Replace the surviving double vault toilet building with two separate vault toilets;

- Place traffic control structures, such as large rocks or logs, to prevent foot and vehicle traffic from disturbing recovering ground vegetation in the campground and adjacent day-use area, to separate sites, and to better define the trail network in the campground;
- Resurface the campground road with a similar surface to what exists;
- Identify a potential new well site;
- Move the Fall Creek Trail trailhead that is currently in the campground to the vicinity of Bedrock Creek on road 1800.419. This trailhead would be built to accommodate four to five vehicles.

B. Purpose and Need For Action:

The Willamette National Forest Plan says the Forest shall provide for a wide range of recreation opportunities compatible with management area objectives and provide a safe recreational setting in developed sites. The purpose of the above proposed actions is to provide for pleasant, safe, and adequate recreational experiences in and adjacent to the Bedrock Campground in the future. There is a need to remove dead trees to provide for future safe camping experiences. While all trees posing an immediate hazard of falling were removed during the fire suppression efforts, branches of the trees killed by the fire have already begun to fall within the campground. Additionally, the trees killed in the Clark fire will begin to deteriorate in the next several years and will pose serious safety concerns for people staying at this campground for decades if they are not felled. These felled trees need to be removed from the campground to prevent the inevitable accidents, to keep fuel loadings low, and to get them out of the way of people using the campground. There is a need to replace the toilet buildings destroyed by the fire as well as a need to replace the surviving vault toilet building, which has exhibited odor problems since its installation, with two separate vault toilets. There is also a need to reforest portions of the campground and to protect redeveloping ground vegetation from disturbance.

There is a need to get this campground in a condition to open to the public by the 2005 camping season to meet user needs, to avoid detrimentally increasing use of other Fall Creek sites, to better control the recreational use of the Fall Creek corridor, and to meet the needs of the campground concessionaire to have a profitable operation by being able to provide a critical mass of developed campground capacity (see page 6, USDA 2004).

There is also a secondary need to improve certain aspects of this campground. A recently prepared recreation strategy paper addressing the Fall Creek Area (USDA, 2004, page 7) has determined that demand for use of the Fall Creek corridor has been above capacity for many years and there is a need for additional campsites. Use of this campground has also changed over the last 20 years; more people now use trailers and motor homes for camping, and some of the sites in the Bedrock Campground are situated such that it is very difficult for trailers or motor homes to enter the campsite spurs. Additionally, day use of Fall Creek in the vicinity of the Bedrock Campground has increased and day users have been parking in the campground, resulting in disturbance to campers and creating problems of site control for the campground concessionaire. There is a need to construct a separate, day-use parking area in the vicinity, and to move trail head use out of the campground. There is also a need to develop a new well in this area as the existing, hand-pumped, well is too shallow or not properly sealed to assure water purity.

C. Decision Framework:

The Middle Fork District Ranger Rick Scott will decide whether or not to implement the above proposed actions and will also determine what actions should be taken to mitigate any potential environmental effects. A determination of Forest Plan compliance will be made with this decision.

III. ANALYSIS ISSUES

A. Scoping Process:

Scoping is an ongoing process used to determine the scope and significance of a proposed set of actions, to determine the issues that should be addressed in analyzing proposed actions, and to determine the alternatives that need to be addressed when accomplishing the analysis. Agency and public comments are solicited throughout the project planning period to help determine the above items. The results of this preliminary analysis were used to help determine the issues for this planning effort.

In order to begin determination of major issues affecting the decision, the first announcement of this proposal was made in the Willamette National Forest "Forest Focus", a quarterly planning newsletter, in the winter of 2003. This newsletter is the initial vehicle used to request comments and concerns about this and similar projects.

The Scoping document for this project, a more comprehensive and focused solicitation of public comment, was distributed, on January 26, 2004, to a 27 address mailing list of people and organizations which have expressed or may have interest in projects of this sort, as detailed in Section VII of this document as well as additional information about public involvement. Copies of the various documents generated and received during the scoping process and their attached mailing lists can be found in the Analysis File under Public Involvement.

The following disciplines comprised the core Interdisciplinary (ID) Team which conducted the analysis of the proposed actions:

- Recreation Facilities Maintenance specialist
- Wildlife Biologist
- National Environmental Policy Act specialist
- Archaeologist

This ID Team did most of the analysis but also consulted with various other resource specialists, as documented in Chapter VII, as needed and as determined by ground conditions.

B. Issues:

The scoping process for this project area identified the following significant issues which determine what effects of the proposed action were analyzed. The issues labels as “significant” issues are those directly related to the above purpose and need for action, or are those most important in differentiating between alternatives. Non-significant issues are also addressed in Section V B. Non-significant issues are not un-important, they are usually addressed by policy or law; all alternatives must address them equally, therefore they do not provide for a differentiation between alternatives.

Water Quality/Fish Habitat – Fall Creek has been designated as critical habitat for Chinook salmon. The proposed activities have a potential to impact water quality, either through erosion or a change in the hydrologic function of the area. Changes in water quality would affect the viability of Chinook salmon and the overall quality of Fall Creek and other aquatic resources.

Evaluation criteria: effects call on threatened and endangered fish

Late-Successional Wildlife Habitat Disturbance – While the habitat affected by the Clark fire is no longer considered late-successional habitat due to tree mortality, there is some relatively unaffected habitat (at least in terms of having large trees with a closed canopy) in the vicinity of the Bedrock Campground. Most of the activities mentioned in the proposed action entail some generation of noise. The Bedrock Campground is within the Fall Creek Late-Successional Reserve and activities generating noise above ambient levels are restricted between March 1 and September 30. Timely completion of the proposed actions would conflict with these seasonal restrictions, and noise generated during the above period could affect the reproductive success of northern spotted owls within one quarter mile of the proposed activities.

Evaluation criteria: weeks of disturbance between March 1 and Sept. 30

Cultural Resource Disturbance - The Fall Creek corridor is known to contain a number of prehistoric cultural sites. Tree removal, campsite construction and reconstruction, and restroom replacement all could disturb these cultural resources.

Evaluation criteria: percentage of significant sites affected

Public Safety (Significant Issue) – The trees killed by the Clark fire present future safety hazards to campground users. All the dead trees that are standing now are sound enough that there is no immediate hazard of them falling in the near future, but as the years go by, these tree stems will begin to rot. Many of the dead trees are quite large, both in diameter and height; some are in excess of five feet in diameter and over 200 feet tall. As these trees deteriorate they will begin to fall, and they have the potential to do extensive injury or to kill people anywhere near them. It would also be hazardous to wait to fell a deteriorated tree until it is ready to fail, as falling a rotten tree can be hazardous in itself.

In the near term, these dead trees still present some amount of hazard. Dead branches have already begun to fall. Large trees such as many of those in this campground can have branches from 20 to 30 feet long and up to four or five inches in diameter. Such a large piece of wood falling from over 100 feet in the air can inflict serious injury or even death.

Evaluation criteria: number of dead trees remaining in high use areas

Developed recreation capacity and quality (Significant Issue)– There is more demand for recreation opportunities (both dispersed and developed) in the Fall Creek corridor than there is capacity. The amount of recreational use of the Fall Creek corridor has increased greatly since the original development of the Fall Creek developed recreation facilities. The operation of the Fall Creek campgrounds has always been economically marginal because they each contain a relatively small number of sites so it is difficult to pay for a full time campground host for each campground. There is an opportunity to add campsites to the Bedrock campground to provide additional developed camping opportunities and to make the operation of this campground more economical.

There is also an opportunity to improve the quality of experience provided at the Bedrock Campground by relocating day use areas to locations that do not increase campground traffic and other disturbance.

Evaluation criteria: number of sites added
number of sites improved
amount of day use eliminated from campground

IV. ALTERNATIVE WAYS TO MEET THE PURPOSE AND NEED

A. The following alternatives were developed to provide a full range of ways to accomplish the purpose and need:

1. No action: This alternative does not respond to the Purpose and Need for Action described above. Display of the No Action alternative is required by the National Environmental Policy Act and provides a baseline for estimating the effects of other alternatives (Forest Service Handbook 1909.15 – Environmental Policy and Procedures, Chapter 10, 14.1)

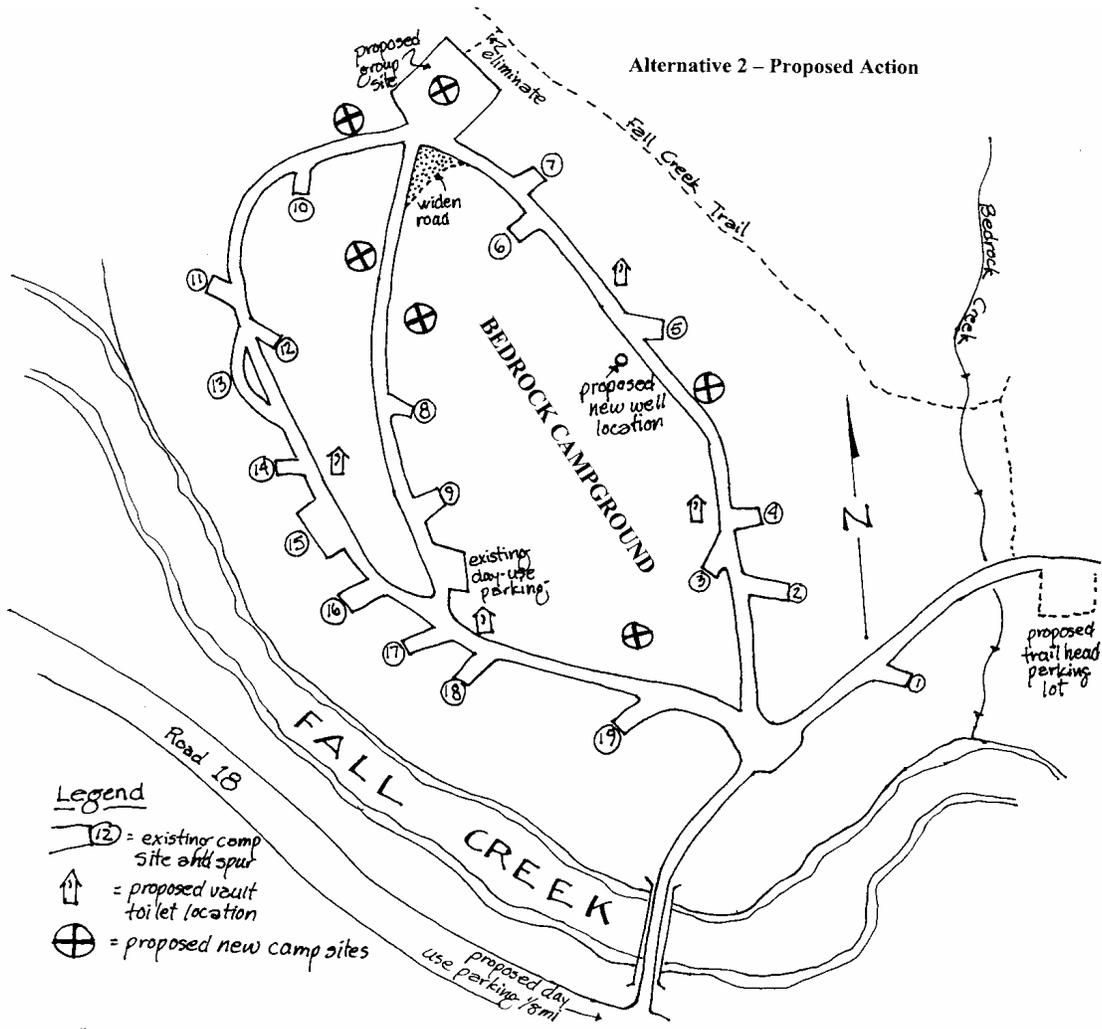
The dead trees in an adjacent to the campground would not be felled or removed. Implementation of this alternative would necessitate the closing of the Bedrock Campground, as it would quickly become a very unsafe place within which to camp (see the discussion above of the Public Safety issue). This alternative would also not implement the above campground improvement projects included in the proposed action, as there would be no point in doing so if the campground were to be closed permanently.

2. **Proposed Action:** this alternative responds to all the issues mentioned above. It would include the following specific activities, as also displayed on the following map.

- Replace two vault toilet buildings destroyed by the fire;
- Replace picnic tables, fire rings, and fences damaged or destroyed by the fire;
- Remove about 250 trees killed by the Clark Fire that pose a safety concern. These would include all trees within or outside of the campground that could potentially fall into the campground or into concentrated use areas adjacent to the campground. Trees on the edge of Fall Creek or Bedrock Creek that lean into campsites or towards the creeks would not be removed, but they would be felled in the future as they deteriorate. These trees would be felled in recognition that many people using the campground also use the creek and a dead tree could pose considerable hazard to those people. The trees would be felled into the creeks, to provide for in-stream habitat;
- Plant trees and manage vegetation re-growth to begin the replacement of vegetation killed by the fire to foster a quality recreational experience;
- Extend and/or widen camp site access spurs for all sites excepts # 2, 8, 11, 13, 16, and 17, to better accommodate trailers and motor homes;
- Add six campsites, as shown on the following map;
- Construct a day-use parking lot (with a vault toilet) to reduce the disturbance of campers by people using Fall Creek for day use. This new parking area would be located to the west of road 1800.190, about 400 feet east of the campground entrance. This parking lot would be open only during daylight hours and signs would be placed on road 18 restricting parking to this parking lot within one quarter mile of the Bedrock campground bridge;
- Replace the surviving double vault toilet building with two separate vault toilets;
- Place traffic control structures, such as large rocks or logs, to prevent foot and vehicle traffic from disturbing recovering ground vegetation in the campground and adjacent day-use area, to separate sites, and to better define the trail network in the campground;
- Resurface the campground road to restore the gravel surface to pre-log removal conditions;
- Locate a new well site;
- Move the Fall Creek Trail trailhead that is currently in the campground to the vicinity of Bedrock Creek on road 1800.419. This trailhead would be built to accommodate four to five vehicles.
- Construct a group or large party site where the existing Fall Creek trailhead is located. This site would be provided with a rustically designed rain shelter.

This alternative would remove about 250 dead trees through execution of a small timber sale. The trees would be removed by a loader that would not leave the existing campground loop road or campsite spurs. All green trees would be retained. All hardwood trees would be retained as they may resprout. About nine large Douglas-fir which were severely damaged by the fire but not killed outright would be retained and monitored. If they do die in the future, they would be felled and their stems used to provide traffic control structures.

Alternative 2 - Proposed Action



Legend

- (2) = existing camp site and spur
- ↑ = proposed vault toilet location
- ⊕ = proposed new camp sites

3. **Salvage and fire restoration only:** this alternative would provide only for the removal of fire-killed trees and replacement of campground facilities damaged by the fire, such as picnic tables and toilet buildings. It includes the first four proposed actions listed on page 11. It responds only to the public safety issue. The other campground and day-use area improvements would not occur.

Alternatives considered but not fully analyzed:

The alternative to leave the campground as it is and continue its operation is not feasible to implement (see the Public Safety issue discussion above). This would result in an extremely unsafe future condition as the dead trees deteriorate. There have been successful legal claims made against the federal government resulting from hazardous trees falling and injuring or killing citizens in recreational areas. The Middle Fork Ranger District is not willing to incur the liability associating with implementing this alternative, and it was not fully considered in this analysis, since such an alternative would not be implemented.

One alternative to address a portion of the purpose and need and the Public Safety issue would be to fall the hazard trees and leave them in place, once facilities such as roads and campsites are cleared. This alternative was not fully considered because it would result in a large number of tree stems on the ground and would provide a rather unattractive recreational experience and a potential high risk for fires. This alternative would likely result in large stacks of large diameter tree bole sections since the stems cleared away from the road and campsites would have to be put somewhere. Treatment of the slash created by the falling of the trees would be problematic as burning it would be risky given the large amount of large tree stems that would be left on the ground. This alternative would also be difficult to implement due to costs, as the felling of trees and clearing of trees from campsites and other infrastructure would not be subsidized by a sale of the felled trees.

B. Mitigation Measures

The following mitigation measures are a part of the action alternatives. These activities would be implemented to comply with management direction and environmental laws and to minimize any adverse impacts from the proposed actions.

- Trees would be removed with equipment capable of at least one-end log suspension, and all machinery required to remove felled trees would stay on the existing campground access loop road or camp site spurs. Most logs would be moved using a shovel-type loader capable of lifting a log, once separated from the whole tree stem, completely free of the ground;
- Construction would occur during the dry periods to minimize the potential for soil erosion;
- Revegetation would occur on the areas disturbed by tree removal and campground facilities upgrading to minimize future soil erosion. Planted areas would be mulched to prevent short-term erosion; planting would include native grasses and forbs in addition to conifer trees. Planted trees would be clumped, protected from big game and human

- damage, and a mix of species, including western red cedar, western hemlock, Douglas-fir, and Pacific yew, would be planted;
- Noise generating construction activities would occur after July 15th to avoid the potential of disturbing the adjacent northern spotted owl habitat during the early (March 1 to July 15) breeding season.
 - All off-road construction equipment would be cleaned prior to site entry to minimize the chance of noxious weed introduction;
 - All portions of felled tree stems which land within designated cultural sites would be left in place to avoid ground disturbance. In general, disturbance of Cultural Resources would be avoided or fully documented (professionally excavated and recorded) if avoidance is not feasible.
 - All trees that would naturally fall into the Fall Creek channel would be felled and left in the stream to provide structural aquatic habitat.
 - Filter cloth and clean gravel would be used to extend campsite spurs to avoid disturbance of cultural sites, if present;
 - Flush cutting of tree stumps would occur where stumps would not provide barriers between sites or to prevent vehicles from leaving the road system.
 - Trails leading from the campground to Fall Creek (in particular those associated with campsites 13 and 14) would be reconstructed to make the trail treads more resistant to erosion.

V. ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE IMPLEMENTATION

A. Discussion of Effects By Issue:

Water Quality/Fish Habitat – there is a potential to impact water quality, either through erosion or a change in the hydrologic function of the area. Changes in water quality would affect the viability of Chinook salmon. The Soil and Water Project Input Report (See the Analysis File) contains an in-depth discussion of water quality effects.

The action alternatives are expected to have a very low risk of creating erosion or any kind of sediment production that would enter Fall Creek. The campground site is generally quite flat, and there are no drainage ways that lead directly to the creek. The removal of trees is not expected to disturb the soil surface much at all since trees would be felled towards the road and loading machinery can simply pull the down stem towards the road and lift the logs onto trucks. Any sediment that might be generated and mobilized (in particular resulting from installation of toilet buildings) would very likely be trapped by the wetland that is on the west edge of the campground, as overland flow would go that way rather than towards Fall Creek.

Alternative B (proposed action) does entail more excavation than Alternative C due to the construction of various campground facilities, but such earthwork would occur during dry months and areas of disturbed soil would be revegetated before fall rains begin. Alternative A (No Action) would provide the lowest risk of any erosion or water quality impacts. Alternatives B and C would remove dead trees from within the Fall Creek riparian reserve, but any trees that would potentially fall into the creek and provide for channel structure would be felled into the creek and retained.

The hydrologic function of the area has been primarily affected by the fire by killing trees that can moderate snow accumulation and pull water from the soil. All alternatives would be the same in terms of hydrologic function influences, since no alternative would result in changed drainage patterns or amounts. Action alternatives would provide for a quicker hydrologic recovery in that they provide for active revegetation as opposed to no action.

Both Alternatives B and C may affect but are not likely to adversely affect the viability of Chinook salmon (see the Biological Assessment for Spring Chinook Salmon – Clark Fire Roadside Salvage in this project’s Analysis File), since no logging equipment would leave existing road surfaces and live vegetation shading Fall Creek would not be reduced.

Late-Successional Wildlife Habitat Disturbance – noise generated during the above period could affect the reproductive success of northern spotted owls within one quarter mile of the proposed activities.

The programmatic Biological Opinion prepared by the US Fish and Wildlife Service for the Willamette National Forest includes and authorizes disturbance associated with campground maintenance and hazard tree removal within campgrounds located in Late-Successional Reserves. It is not known exactly when all activities contained in the action alternatives may occur as some are weather dependant and many depend upon contractor availability and timely deliverance of materials and vault toilet buildings. It is assumed that most proposed activities would occur within the rearing portion of the northern spotted owl rearing season (July 15 to September 30).

Alternative A (No Action) would not result in any wildlife disturbance. Alternative B would result in approximately six weeks of intermittent noise production, about half of which would be associated with the felling and removal of dead trees and the other half with excavation of vault toilet sites, parking lot construction, road reconstruction, and campsite or access spur extension construction. Alternative C would generate about three weeks of intermittent noise generation.

Cultural Resource Disturbance - The Fall Creek corridor is known to contain a number of prehistoric cultural sites. Tree removal, campsite construction and reconstruction, and restroom replacement all could disturb these cultural remains.

The No Action alternative would have no potential for disturbance of cultural resources. Disturbance of cultural sites from implementation of Alternatives B or C would be avoided as much as possible by leaving trees that cannot be felled away from cultural sites in place where they land on the sites. Alternative B could potentially disturb several sites through construction of the new vault toilet building if they cannot be located in a site-free area. In which case, the sites would be fully documented (excavated). It is estimated that Alternative B could potentially disturb about 5 percent of the existing cultural sites, and Alternative C could disturb about two percent of the sites.

Public Safety (Significant Issue) – The trees killed by the Clark fire present future safety hazards to campground users and those hazards need to be mitigated.

Alternative A (No Action) would not remove any hazard trees. Public safety concerns would be mitigated under this alternative by closing the campground, but the area would likely continue to receive day-use because the Middle Fork District staff is inadequate to enforce absolute closure of the area. Alternatives B and C would remove about 250 dead trees to provide for future public safety and would monitor the health of another nine conifer and many hardwood trees that would be retained initially but which may die in the future. These latter trees would be felled and used for campground firewood and/or traffic control barriers in the campground if they do eventually die, or are determined to be dead in the near future.

Developed recreation capacity (Significant Issue) – There is more demand for recreation opportunities (both dispersed and developed) in the Fall Creek corridor than there is capacity.

Alternative A (No Action) would result in a net loss of 19 camping sites in the Fall Creek corridor since the campground would be too hazardous to remain open to the public. Alternative B would result in an increase in the capacity of Bedrock Campground of about six sites, one of which (the existing Fall Creek trailhead) would be a larger group camp site. Alternative C would not add any additional camp sites, but the capacity of Bedrock Campground would remain the same at 19 sites.

Alternative A (No Action) and Alternative C would not improve any campsites. Alternative B would improve about 13 sites through spur lengthening, curve widening, and/or barrier placement. It would also improve the campground concessionaire's operation in that profits would be increased for this business with known low profit margins, and additional income may make it easier to pay competitive wages for campground hosts.

The addition of new campsites in Alternative B would not likely cause a significant change in dispersed site use; to some extent developed site users tend not to use dispersed sites and vice versa. This alternative would provide a higher quality developed recreation experience for the roughly seven parties per day (during high use periods) that will secure a camping site in Bedrock Campground.

B. Alternative Effects on Resources other than Project Specific Issues:

Response to the Aquatic Conservation Strategy Objectives

The Aquatic Conservation Strategy objectives presented on page B-11 of the Northwest Forest Plan Standards and Guidelines (USDA/USDI, 1994) relate to several of the above issues. The objectives are presented below and are abbreviated. The rationale for the finding of these effects is contained in the Soil and Water Project Input Report found in the Analysis File for this project and is briefly summarized here.

1. Maintain and restore the distribution, diversity, and complexity of watershed features;

Neither the action alternatives nor no action would have an effect upon watershed and landscape-scale features. The campground occupies only about five acres and the trees to be removed were killed in a landscape scale wildfire.

2. *Maintain and restore spatial and temporal connectivity within and between watersheds;*

The proposed actions would have no effect on riparian spatial connectivity within and between watersheds above and beyond the impacts of having a campground in a riparian area in the first place. The connective functions of the Fall Creek riparian area would not be fully compromised by the removal of fire-killed trees or construction of campground improvements.

3. *Maintain and restore the physical integrity of the aquatic system, including shorelines, banks, and bottom configurations;*

The proposed activities would have some effect upon the integrity of the aquatic ecosystem; all trees killed by the fire that would eventually fall into Fall Creek would be retained in the channel, at least until they are moved by high winter flows. Shorelines, stream banks, and stream bottom would be unaffected by campground restoration and salvage.

4. *Maintain and restore water quality necessary to support healthy riparian, aquatic, and wetland ecosystems;*

Implementation of the proposed activities would have no effect to riparian, aquatic, or wetland ecosystems. Water quality would not be affected, as discussed above under the Water Quality issue. Mitigating measures such as mulching, planting, and restricting equipments to existing hardened roads would minimize the risk of degrading water quality.

5. *Maintain and restore the sediment regime under which aquatic ecosystems evolved;*

Implementation of the proposed activities would have no effect on the sediment regime for the watershed if mitigating measures were implemented as proposed. Alternative B would correct the two existing creek access trails that may contribute sediment to Fall Creek during rain storms.

6. *Maintain and restore in-stream flows sufficient to create and sustain riparian, aquatic, and wetland habitats and to retain patterns of sediment, nutrient, and wood routing;*

Implementation of the proposed activities included in any of the action alternatives would have no effect on in-stream flows; both peak and low flows. Any hydrologic changes have occurred as the result of the fire.

7. *Maintain and restore the timing, variability, and duration of floodplain inundation and water table elevation in meadows and wetlands;*

There are no floodplains in the project area. There would be no effect on the parameters of floodplain inundation and water associated with meadows and wetlands.

8. *Maintain and restore the species composition and structural diversity of plant communities in riparian areas;*

Biological, physical, and chemical integrity would remain unchanged from what was affected by the Clark Fire or the long-term presence of this campground.

9. *Maintain and restore habitat to support well distributed populations of native plant, invertebrate, and vertebrate riparian-dependant species.*

No change in habitat conditions are anticipated given the mitigation measures presented above, other than a decrease in cavity nesting habitat from dead tree removal. See the Botany, Wildlife, and Fisheries biological evaluations contained in the Analysis File.

Threatened, endangered, and sensitive species are addressed in the Bedrock Campground Restoration Project Terrestrial Fauna Biological Evaluation (BE), Fish Biologist Report, and Botanical BE, which can be found in the project Analysis File. The BEs were conducted to evaluate the effects on TES plant and animal species within the analysis area. According to the Wildlife BE, the northern spotted owl and the American bald eagle are threatened species that may be affected by implementation of this project. The spotted owl may be affected but is not likely to be adversely affected, and the bald eagle would not be affected by activities proposed by the action alternatives.

Habitat for a number of sensitive species occurs within the project area, as discussed in the Wildlife and BE in the Analysis File. Most of these species are associated with riparian area and wetland special habitats. The action alternative would remove many dead trees that would eventually provide for cavity nesting habitat, but the campground never did have, for safety reasons, and standing dead trees in it.

Late-Successional Habitat and LSR effects

Implementation of either the action alternatives would not retard or prevent the attainment of LSR objectives. The Biological Evaluation and Wildlife Report, contained in the Analysis File for this project, does not specifically address late-successional habitat nor LSR function, but it does specifically address northern spotted owl effects, the central species LSRs were designed to provide for. That report states the area no longer contains late-successional habitat due to fire effects. Implementation of Alternative B would not change the extent or scope of developed recreational facilities within the LSR. Though an additional six campsites would be added to the Bedrock Campground, the area currently occupied by the campground would not increase. An approximately 25 percent increase in population of the campground when filled to capacity would not create a measurable increase in ambient noise or other habitat disturbance that is generated by the recreational use currently occurring in the campground and the Fall Creek Special Interest Area in general.

Air Quality

The only potential effect on air quality would be the disposal by burning of the slash generated by felling fire-killed trees. This material would be piled and burned during times and conditions such that the generated smoke would be in compliance with State air quality regulations.

Cultural Resources

The project site was reviewed for cultural resource sites, and sites known to exist in the project area would be protected or mitigated (see the Project Review for Heritage Resources Report in the Analysis File). If any cultural sites were found during implementation of any proposed activity within the action alternatives, the activity would be discontinued, and special use permit clauses would be invoked until the site could be evaluated for significance and appropriate mitigation measures performed.

Soils

A soils report has been prepared for this project and can be found in the Analysis File. This report indicates (page 5) that Alternatives 2 and 3 would have only minimal effects upon soil and water resources; surface soil disturbance is anticipated to be minimal to none from removal of trees since equipment would be restricted to the existing road system. Mitigating measures listed above would result in little to no soil erosion and stream sedimentation from the proposed campsite, spur widening and lengthening, well drilling, and vault toilet construction. Alternative A (No Action) could cause some soil erosion in the near term due to lack of managed revegetation, and could cause additional erosion in the future to the extent that fallen trees might divert storm flows from their normal course.

Soil compaction occurs in campgrounds and is typically restricted to very local areas such as the roads and trails, and immediately around fire rings and picnic tables. Amelioration of this compaction is essentially impossible without eliminating the campground, as cultivation would adversely affect established ground vegetation and the roots of living trees, not to mention the camp site facilities themselves, and if the campground is still to be used, the soil would become recompact in a short time. Compaction can be a concern when proposing reforestation or revegetation. Since the proposed revegetation would not occur within campsites, the existing soil compaction would not materially affect the success of revegetation. Widening or lengthening camp site spurs should not create much of an increase in soil compaction because typically the areas to be affected are within existing campsites and are already compacted. The construction of new sites would eventually and slightly increase the amount of compacted soil in this campground, but not significantly so.

Cumulative Effects

Cumulative effects are the effects of the action(s) in question in combination with effects caused by other, past actions and reasonably foreseeable future actions (40 CFR 1508.7; FW-093, 081). Reasonably foreseeable future actions are those for which effects can be fairly accurately estimated; typically actions which have been planned and decided upon, though they may not have taken place prior to this analysis. There are three other fire salvage projects underway associated with other areas affected by the Clark Fire. The proposed actions for two of these projects (one of which is addressing fire effects in the Fall Creek Special Interest Area corridor, and the other addressing fire effects in the Late-Successional Reserve on the southerly slopes above Fall Creek and the Bedrock Campground) have yet to be fully developed, so it was not possible to include the effects of these potential future projects in the effects of this campground restoration proposal. The effects of this proposal will be taken into account in the two other future actions. The third fire salvage project, removal of hazardous trees along Road 18, has been finalized and the effects of that proposal have been taken into account in this analysis of campground restoration. None of the three other fire restoration projects are proposing or did propose any activities that would affect the amount or types of developed or dispersed recreation facilities in the Fall Creek SIA.

Past actions, including the effects of the Clark fire, have been taken into account in the above discussion of environmental effects. One of the effects of the fire was to increase the possibility that more dispersed campsites are formed. The fire removed or greatly reduced the understory vegetation and has increased the potential that vehicles can leave the road system where they could not before, allowing people to potentially create new dispersed sites. The Alternative B

proposal to create new campgrounds sites may somewhat reduce the potential for new dispersed site creation, to the extent that a party wanting to camp at the Bedrock Campground would, were there not additional campsites available, be willing to go to a dispersed camping site that offers no amenities or services such as a water source and toilets.

Effects on Recreational Opportunities

The Action Alternatives would maintain the range of safe developed recreation opportunities available in the Fall Creek area, as discussed in the Above Purpose and Need statement and the Developed Recreation Capacity Issue discussion. Implementation of the No Action alternative would not comply with Forest Plan direction to provide a range of safe recreational opportunities. The proposed action (Alternative B), would provide improvements to the campground, including additional sites, day-use parking, new trailhead construction, reconstruction of trails accessing Fall Creek, and improved restroom facilities. Implementation of this alternative would increase the number of people that could enjoy developed camping experiences in this campground by about 25 percent, and by 11 percent in the Fall Creek corridor.

The Recreational Fisheries Executive Order #12962 (June 8, 1995) directs Federal agencies to improve the productivity of aquatic resources in order to increase recreational fishing opportunities. This project area provides recreational fisheries. Nothing proposed by the action alternatives would affect recreational fishing quality or opportunities.

Effects on Irreversible and Irrecoverable Commitments of Resources

No irreversible commitments of resources would result from the proposed action, other than the use of crushed rock to construct the parking area and road re-surfacing. No irretrievable commitments of resources would occur.

Short-term and Long-term effects

The No Action alternative would have no short-term environmental effects but it would have a long-term effect on the range and amount of recreational activities available on the Middle Fork Ranger District. It would have a short-term negative effect on user safety to the extent that the Forest Service may not be able to completely eliminate public use of the campground. The proposed actions would have negligible short-term environmental effects, and would have positive long-term effects in that they would provide for a more rapid recovery of riparian vegetation. Alternative B would have the long-term effect of providing 25 percent more developed camp sites in Bedrock Campground, and an additional 11 percent in the entire Fall Creek corridor.

Effects on Consumers, Civil Rights, Minority Groups, Women, and Environmental Justice

Executive Order #12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, directs Federal agencies to address effects accruing in a disproportionate way to minority and low income populations; The closest population or habitation to the project area is the City of Lowell, (population 1100), some 14 road miles south of the project area. This community contains some low income people and some minority persons. No disproportionate impacts to the citizens of Lowell are anticipated.

Effects on American Indian Rights

No impacts on American Indian social, economic or subsistence rights are anticipated. No impacts are anticipated related to the American Indian Religious Freedom Act. Several tribal organizations within the State of Oregon which have historic interests in this area have been contacted in reference to this proposed action and environmental analysis.

Effects on Farmlands, Rangelands, and Forestlands

No farmland or rangeland is found in the project area. The project area is surrounded by forest land; the proposed action would reforest about three acres of area deforested by fire. The proposed action is consistent with the management direction contained in the Willamette National Forest Land Management Plan as amended by the Northwest Forest Plan.

Effects on Wetlands and Floodplains

There are no wetlands or floodplains within the project area. The fish-bearing Fall Creek is immediately adjacent to the campground. None of the alternatives would have an affect upon wetlands or floodplains.

Indirect and Unavoidable Effects

There will be no significant indirect or unavoidable effects to soil, water, fisheries, or wildlife resources or other components of the environment.

C. Alternative Comparison

	Alternatives		
Issue	A – No Action	B – Proposed Action	C – Salvage Only
Water quality/salmon habitat	No risk/ no affect to salmon	Low risk/ may affect, not likely to adversely affect salmon	Low risk/ may affect, not likely to adversely affect salmon
Late-Successional/ owl disturbance	No disturbance	Potentially six weeks of noise generating activities during rearing season	Potentially three weeks of noise generating activities during rearing season
Cultural resources	No disturbance-	5% of sites disturbed	2% of sites disturbed
Public Safety	250+ hazard trees remaining	No large hazard trees remaining; 9 mostly dead trees retained and monitored	No large hazard trees remaining; 9 mostly dead trees retained and monitored
Developed Recreation Capacity	Net reduction of 19 campsites	Six sites added 13 sites improved	No change in site numbers or condition

D. Legal and Policy Requirements, and other NEPA Decisions

The action alternative complies with the following legal and policy requirements as follows:

Federal Laws and Policies:

The Preservation of American Antiquities Act, June 1906---The area proposed for ground-disturbing activities has been evaluated for the presence of inventoried cultural resources. No inventoried sites exist on this site which was heavily disturbed during the original road construction. The areas disturbed would be limited to that areas previously disturbed by road construction (see the Project Review For Heritage Resource form in the Analysis File).

The National Environmental Policy Act (NEPA), 1969---NEPA establishes the format and content requirements of environmental analysis and documentation such as the Bedrock Campground Fire Recovery project analysis. The entire process of preparing an environmental assessment was undertaken to comply with NEPA requirements, as codified by 40 CFR 1501 and the Forest Service Handbook 1909.15, Chapter 40.

The Endangered Species Act, December 1973--- Field surveys for all listed endangered, threatened, or sensitive species has been conducted to determine possible effects of any proposed activities in the project area. (see the Wildlife and Plant Biological Evaluations in the Analysis File).

The National Forest Management Act (NFMA), 1976---All alternatives were developed to be in full compliance with NFMA via compliance with the Willamette National Forest Land and Resource Management Plan, as amended. This EA contains references as to how this project complies with Forest Plan and Northwest Forest Plan standards and guidelines, usually parenthetically.

Clean Air Act Amendments, 1977---The action alternatives are designed to meet the National Ambient Air Quality Standards, as direction by the Oregon Smoke Management Act, through avoidance of practices which degrade air quality below health and visibility standards.

The Clean Water Act, 1982---The alternatives all meet and conform to the Clean Water Act, Amended 1982. This Act establishes a non-degradation policy for all federally proposed projects. None of the action alternatives would degrade water quality below standards set by the State of Oregon. This is accomplished through project design and planning, application and monitoring of Best Management Practices (BMPs – see the above mitigating measures), and adherence to the Northwest Forest Plan's Aquatic Conservation Strategy Objectives (See the Soils and water report in the Analysis File).

Consultation with the *Oregon State Historic Preservation Officer (SHPO)*---SHPO has been consulted concerning proposed activities. The Advisory Council on Historic Preservation (ACHP) has been consulted about measures to protect significant archeological sites from adverse effects (see the Project Review for Heritage Resources Form in the Analysis File).

Other NEPA decision documents:

The Standards and Guidelines contained in *The Willamette National Forest Land and Resource Management Plan* (USDA, 1990, as amended by USDA/USDI, 1994) played a major role in determining the Purpose and Need and in the development of all the alternatives. As mentioned above, the action alternatives comply with all aspects, standards, and guidelines of the Forest Plan, in particular the direction concerning disperse recreational use within Late Successional Reserves (Northwest Forest Plan pages C-11 and 18).

VI. MONITORING PLAN

The nine nearly dead conifers and the many hardwoods that were severely scorched by the fire would be monitored to verify their survival. Fall Creek water quality would be informally monitored during logging and construction activities. A Cultural Resource technician would be on-site during construction activities to monitor the protection of cultural sites.

VII. CONSULTATION WITH OTHERS

A. Public Notification:

Notice that a planning effort was to begin in this area was first published in the Fall, 2003 edition of the Willamette National Forest's Planning Newsletter, The Forest Focus, which constitutes the Forest's quarterly Schedule of Proposed Actions (SOPA). This newsletter is sent to a mailing list of potentially interested parties, with the intent of providing information and an invitation to provide input or become directly involved in the planning process.

The following groups and individuals were sent copies of the scoping document for this proposal due to their past interest in District programs and/or have provided written or oral input during the project planning period:

The City of Lowell
Documents Department, University of Oregon
The Dead Mountain Echo (Oakridge weekly newspaper)
U.S. Fish and Wildlife Service
Oregon Natural Resource Council
The Many Rivers Group of the Sierra Club
Confederated Tribes of the Warm Springs Reservation
Confederated Tribes of the Grande Ronde
The Klamath Tribe
The Siletz Tribe of Indians.
Mike Stahlberg, Eugene Register Guard Outdoor Editor
Editor, Dead Mountain Echo (Oakridge weekly newspaper)

Lane County Audubon Society
Southern Willamette Earth First!
The Sierra Club
The Native Plant Society of Oregon
Cascadia Wildlands Project
Dan Geiger, U of O Outdoor Program
The City of Oakridge
Hoodoo Recreation Services

B. Public Participation:

To date, no formal public responses to this proposal have been received by the Middle Fork Ranger District. A notice of availability for this EA has been sent to the people and organizations on the above mailing list for a 30 day public comment period.

C. U.S. Forest Service Participation:

The following Middle Fork District personnel were directly consulted during this analysis, and/or submitted reports as part of the analysis of the proposed actions:

botanist	soil scientist/hydrologist	recreation specialist
fisheries biologist	wildlife biologist	
archaeologist	NEPA specialist	

VIII. CONTENTS OF THE PROJECT ANALYSIS FILE

The following documents and reports were prepared as part of the analysis for the Bedrock Campground Fire Restoration project. These documents are on File at the Middle Fork Ranger Station, Westfir, Oregon.

- Biological Evaluations and Reports- wildlife, botanical, and fisheries
- Cultural Resource Survey Documentation
- Public Comments/Correspondence
- Soil and Water Project Input report

IX. Literature Cited

USDA, 1990. Land and Resource Management Plan for the Willamette National Forest. USDA Forest Service, Pacific Northwest Region, Willamette National Forest. Eugene, Oregon. July, 1990.

USDA, 2004. Fall Creek and Winberry Creek Social Use and Strategy Paper. Middle Fork Ranger District, Willamette National Forest, USDA Forest Service. January, 2004.

USDA/USDI, 1994. Record of Decision on Management of Habitat for Late-Successional and Old Growth Forest Related Species within the Range of the Northern Spotted Owl. USDA Forest Service and USDI Bureau of Land Management, Pacific Northwest Region, Portland, OR, April 13, 1994.

USDA, USDI, 1998. Mid Willamette Late-Successional Reserve Assessment. USDA Forest Service Willamette National Forest, USDI Salem District of the Bureau of Land Management, and USDI U.S. Fish and Wildlife Service Oregon State Office. August 24, 1998.

Public Comment Response

Appendix to the Bedrock Campground Restoration Environmental Assessment

Response to comments on the above EA from Doug Heiken of the Oregon natural Resources Council (ONRC) on April 23, 2004, via e-mail. This EA was available for a 30 day, publicized, public review which ran from March 29 to April 27, 2004. Mr. Heiken's comments are italicized.

I toured this campground with Rick Scott and he never mentioned that this was going to include expansion of the campground. I got the specific impression that we were in agreement that the FS should consider doing the absolute minimum needed to maintain safety will meeting the objectives of the land allocation.

A copy of the January 26, 2004 Scoping document, which was mailed to the Oregon Natural Resources offices, specifically mentioned campground spur road extensions and widening, addition of campsites, and construction of a day-use parking lot as part of the Proposed Action. Regarding developed campgrounds, the Mid Willamette LSR Assessment (page 13) states “the scope or spatial extent of these areas is minor both for individual LSRs and even more so when considered from the total LSR acres in the assessment area. Potential adverse impacts to late-successional stands are minimal and are limited to a very small area....The NWFP standards recognize continued use and maintenance of these areas...as consistent with LSR management”. It also states (page 145) that “Expansion of existing facilities...should not preclude LSR and ACS objectives”. We do not believe that the addition of six new camp sites (a 25% increase; EA page 18) within the existing footprint of an existing campground constitutes expansion, especially since the LSR Assessment page 13 discussion talks about the spatial extent of developed recreation sites. From a spatial perspective, the Bedrock Campground would not change with the addition of 6 new sites, since they are all located interior to the existing Campground perimeter.

Mr. Heiken did not submit any scoping comments regarding this project. The only scoping comments received by the Middle Fork Ranger District from ONRC was a phone call from an affiliate named Chandra. Those comments were related to the day-use parking area, and more specifically related to the type of surface proposed for the parking lot and whether or not it would be permeable (See e-mail from Jim Williams dated 2/9/04 in the correspondence section of the project analysis file).

- 1. I don't see the EA for the Bedrock expansion project on the web. Can you please email me the EA including maps that show the existing and proposed facility changes.*

The Bedrock Campground Restoration EA was not posted of the Willamette National Forest website because it includes some non-digital maps. The maps are crucial for people to understand what has been proposed, especially in relation to where the proposed additional campsites would be. Mr. Heiken was mailed a copy of the EA the day his comments were received (4/23/04).

- 2. Widening spurs to facilitate motorhomes is inconsistent with the ACS and LSR objectives.*

The Bedrock Campground Restoration EA contains, on page 18, a discussion and rationale as to why the proposed actions would not retard or prevent the attainment of LSR objectives, and on pages 16 and 17 contains rationale as to why the proposed actions would maintain or restore Aquatic Conservation Strategy (ACS) Objectives. This proposed action is not included in this decision.

3. *Adding six new camp sites is inconsistent with the ACS and LSR objectives.*

Addition of campsites is not included in this decision. See the rational above regarding whether such an addition would prevent attainment of LSR and ACS objectives.

4. *Constructing a new group camp site is inconsistent with the ACS and LSR objectives.*

Construction of a group campsite is not included in this decision. See the rational above regarding whether such an addition would prevent attainment of LSR objectives.

5. *Construction of the day-use parking lots is inconsistent with the ACS and LSR objectives.*

The day use parking lot construction proposed is at the junction of Forest road #18 and 1800.190, about one eighth of a mile east of the Bedrock Campground and south of Fall Creek. Fall Creek is the southern boundary of the LSR, therefore, the day use parking lot location is not within the LSR. It is within the Fall Creek riparian reserve, though road 18 is between the parking lot location and Fall Creek.

One other trail head parking area is proposed at the existing trail head on road 1800.419, just east of it's crossing with Bedrock Creek. This location is in the LSR. Trail users have and do park along the road in this area to use the Jones Creek and Fall Creek trails, and people do occasionally, and partially, block the road. The proposed parking lot would provide for four or five vehicles (EA page 11) and the area it would be located in experienced high fire mortality. Construction of this trail head parking area would not constitute additional loss of habitat or change disturbance patterns from existing use. This location does not now provide functional late-successional habitat and will not for decades to come.

The Bedrock Campground Restoration EA contains, on page 18, a discussion and rationale as to why the proposed actions will not retard or prevent the attainment of LSR objectives, and on pages 16 and 17 contains rationale as to why the proposed actions would maintain or restore Aquatic Conservation Strategy Objectives.

6. *Is there any needs assessment to back up the proposal?*

Yes. See page 7 of the EA, which refers to a local document entitled "Fall Creek and Winberry Creek Social Use Strategy Paper" which determined there is a need for additional recreational facilities and regulations in this area due to the magnitude of use.

7. *What alternative locations were considered for these developments outside of the LSR and riparian reserves?*

None. Location of new recreational facilities is outside the scope of the Bedrock Campground Restoration analysis. See page 7 of the EA. The “Fall Creek and Winberry Creek Social Use Strategy Paper” mentioned above did address the possibility of constructing another campground in this area. The paper recognized that there is no funding available in the foreseeable future to construct an entirely new facility, and observed that there were few possible locations suitable for a campground other than the flat valley bottom that is in the Fall Creek riparian area. In addition, people want to recreate and camp near water in a mature forest, so relocating this developed site would create new and additional conflicts. Not providing developed camping sites would create more impacts on the land by not managing impacts at a designated facility.

8. *Maybe this campground should be closed (permanently or temporarily) to protect the public and meet the land allocation objectives.*

The option to close campground was addressed in the EA (page 10) as the No Action alternative. The suggestion to implement this alternative would not address the purpose and need for action, as discussed on page 10 of the EA. See also the response to comments # 6 and #7 above.