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November 3, 2008

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595 NW Industrial Way
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Dear Jim,

Thank you for the opportunity to comment on the Rethin Timber Sale Preliminary Assessment (PA). This project will log approximately 2,200 acres of forest in Late-Successional Reserve, Riparian Reserve and Matrix land allocations. This includes several miles of road reconstruction, as well as deconstruction and/or road closures.

Bark has nearly 5,000 supporters who use the public land forests surrounding Mt. Hood, including the areas proposed for logging in this project, for a wide range of uses including, but not limited to: clean drinking water, hiking, nature study, non-timber forest product collection, spiritual renewal, and recreation. In over ten years of monitoring activity in the western Cascades, **Bark believes the opportunity for active restoration is significant, and we are encouraged to see the Clackamas District of the Mt. Hood National Forest moving in this direction.**

We have visited all areas of the proposed timber sale, including groundtruthing many of the acres proposed for logging. We have attached our groundtruthing forms with these comments. We will continue to visit the units and submit forms as we have visited them. One of the difficult trends posed by the Forest Service is the decrease in flagging and marking for the timber sales. **We have been very discouraged to find that the Forest Service has used virtually no field markings for this timber sale, leaving little proof that land managers have even been to the forests they are proposing to log. More importantly, it makes it difficult for the public to provide any substantive feedback to the decision maker.**

As stated in the scoping letter, **full Environmental Assessments, not PAs nor CEs should be used. PAs have proven to be misleading in Bark's attempt to rectify proposed actions and evidence in the field. In addition to providing an Environmental Assessment prior to rendering a decision, does not agree with projects that span such large amounts of landscape. .** The proposed actions

encompass several watersheds, and there are differences in elevation of thousands of feet with markedly different vegetation patterns, soil and earth flow conditions, and existing wildlife; these make the ecological and geophysical scope too broad for project issues to be handled by a single document. In addition, the size of this project (2,200 acres spread out over 20 miles) poses problems for the public to effectively comment on or participate in the planning process.

And finally, the PA has not fulfilled this request from our scoping comments:

Accurate and fully marked maps of the project areas. Riparian areas, LSRs, and management designations, roads, streams, wildlife corridors, and other relevant GIS layers should be clearly marked. NEPA is supposed to allow for informed decision-making and the accuracy of maps is a crucial component. We recognize that unit maps produced by the Forest Service have improved over time; we hope this trend continues.

GIS layers developed or utilized in relation to this project and future projects be made publicly available on the Mt. Hood National Forest Data Distribution Library (http://www.fs.fed.us/r6/data-library/gis/mthood/data-library.html). (Bark scoping, 1)

The Rethin PA has very little description of the past prescription for logging. The provided unit map is the only recognition of the past timber sales as separate planning initiatives. When Bark volunteers went out the proposed area, we found that not only were the units diverse in their current state, but had clearly been logged with varying techniques. For example, in Unit 44, we found that one unit was made up of two past units. Unit 44 is separated by Road 6310-220 and on the south side of the road had probably been marked for "Take" and only the minor tree species had been removed, leaving a dense stand. However on the north side of the road, "Leave" trees still showed orange rings and the forest was much more open. Using a single prescription for this unit will have drastically different impacts for one half than it will to the other half. Where does the Forest Service address this through the EA process?

ADDITIONAL ALTERNATIVES MUST BE PROVIDED

The range of alternatives included in the Rethin Preliminary Assessment is unacceptable, especially considering the background of this timber sale. Rethin is returning to logging projects that where silvicultural practices have been improved and the Forest Service hopes to rectify mistakes. (PA, 3), though the majority of them were logged within the past decade. Our concerns for the origins of this project and the necessity are laid out in our comments. However, with regards to the NEPA requirement for a range of alternatives, this timber sale seems like a particularly appropriate example of why land managers and the public should see that the agency is considering all options for how to keep our public lands healthy. **If this timber sale is intended to remedy mistakes by using the same framework, thinning, a range of considered options is expected.**

Under NEPA, the Environmental Assessment (EA) is required to provide a detailed statement of alternatives to the proposed action, and the environmental impacts of both the proposed action and the alternatives. 42 USC § 4332, 40 C.F.R § 1508.9. An agency must look at and discuss every reasonable alternative within the range dictated by the nature and scope of the proposed action. Northwest Environmental Defense Center v. BPA, 117 F.3d 1520, 1539 (9th Cir. 1997). The EA prepared for the Rethin Timber Sale fails to give an adequate discussion or analysis of alternatives to the proposed action. The scope of alternatives is only adequate if the alternatives presented permit decision-maker a reasoned choice. By not providing any concrete alternatives to the proposed project, or any discussion of the environmental impacts of an alternative, this EA does not meet the requirements of NEPA. As such, we fully expect the forthcoming EA to include a range of alternatives.

INCLUDE RELEVANT PAST, PRESENT & FUTURE ACTIONS

The lack of information included in the PA about past, present and future actions that may cause cumulative impacts is shocking. The only actions called out are the Cascade Crest Fuelbreak (which is miles away from the Project Area) and the LaDee Flat OHV area (which is erroneously portrayed as "near" the project area when it is, in fact, directly adjacent to and in Units 2 & 3 of the Project Area). (PA, pg 37) The PA vaguely refers to other restoration projects in the area, but with no analysis of the impact that logging may have on these important (and expensive) priorities. The PA does not call out Cloak (active), No Whisky (active), and Upper Clack Thin (post-EA) Timber Sales. In fact, there is an exemption on the future thinning in the cumulative effects spreadsheet. (PA 51) It also does not directly refer to the 2007 Clackamas Restoration EA or any other restoration initiative, despite markers in the area showing that snag creation work has been occurring in this past year. The PA claims to have information about these actions included in the project record for the cumulative effects analysis (PA, 20), however this information absolutely relevant to the public's input and ought to be shared in the PA. Bark and other concerned citizens have commented on all of these EA processes, therefore it is obviously in the public's interest to know that these actions have direct impacts with regards to roads being used for multiple projects, shared boundary lines and water features.

The Upper Clack Thin is a collaborative stewardship project with the Clackamas Stewardship Partners (CSP), of which Bark is a member. A driving intent behind stewardship projects is to find reliable funding for much-needed restoration projects in the Clackamas District. By ensuring that stewardship groups like the CSP have an influence on the design of a timber sale that will have mitigation measures for the destructive impacts of logging while still providing a source of funding for future restoration, this involvement gives the agency more credibility in the timber sale program. However, manipulating the NEPA process and leaving it to the public to connect the puzzle pieces of multiple timber sales and agency actions is unacceptable. As the agency moves towards an adaptive resource management model, monitoring

and analysis of iterative decision-making will become essential to the effectiveness of groups like the CSP.

The regulations implementing NEPA state that cumulative effects result "from the incremental impact of the action when added to other past, present, and reasonably foreseeable future [federal and non-federal] actions." 40 C.F.R. § 1508.7. "Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts." Id. § 1508.27(b)(7).

ALL ROADBUILDING HAS AN IMPACT

Bark has consistently shown concern for the use of roads for logging and despite the deterioration of aquatic passages, slope integrity and wildlife corridors with continued use, the Forest Service does not seem serious about heeding to the warnings.

The proposed action does not include the building of new roads, however it plans to open several closed roads for *temporary* use. We have found that this use of the word temporary is often misleading. Putting up a berm and taking the road, even a spur road off the agency's record-keeping is not an effective way of decommissioning a road and often encourages continued use by off-highway vehicles and hunters. **We fully expect to see the proposed roads, spur roads and haul routes for this timber sale included in the Environmental Assessment. As it stands, information on roads and routes has not been provided in the PA.**

In considering several of the system roads, we submit the following observations to be considered with regards to necessary maintenance that should occur before running many heavy truckloads over them. As well, our recommendations for allowing this timber sale to lead to effective restoration would be to permanently remove access to several of the road systems and promote a one-time entry management plan, considering the comprehensive nature of the thinning regime along roads such as 6310 with back-to-back, simultaneous thinning.

4545 (at junction with 130 spur) – This road will be intersected by the proposed Palomar pipeline route. It is our assumption that Palomar will use it for the installation and maintenance. The proposed crossing occurs before the 130 spur, however, the spurs beyond may need to be incorporated into the plan to avoid new roadbuilding.

We have documented a failed closure on this road, due to vandalism. Additionally, the metal closure device on spur 130 is broken. The berm created to block bypass is ineffective. There are signs of target shooting. A road closure sign has been shot down. Some of the culverts have signs of pooling on the inflow and outflow, as well as inboard ditch discharge meeting up with streams at inflow.

We have concerns that with such aggressive signs of passing a closure and possible culvert issues, that an earthen berm may not be effective on 4645, unless it was reinforced with a double berm construction. With the proximity to Tag, Mag and Tar Creek, we would support removal of all culverts in this road system. It serves no connecting opportunity.

Road 6310, erosion risk

6310 – We witnessed an area with major landslide potential. We expect to see how the Forest Service will manage this erosional feature through the duration of this project disclosed in the EA.

6310210 - This road is of considerable concern to us. It winds along a steep slope down to the Upper Clackamas River and has several unstable gulch turns. In particular, between Unit 44 and 45 a drainage has shown signs of a blocked culvert and fillslope damage from water flowing over the roadbed. There seems to have been maintenance recently done along this road, culverts and inboard ditches mechanically cleared. This would imply that the Forest Service is aware of the landslide potential on this road. Road 6310-210 and all corresponding system roads should be not just decommissioned, but be considered for full active removal from the forest.

6311140, 150, 170 – The entirety of 6311 and spur roads should be considered for closure. It serves not connecting needs and is currently impacting Cap, Sluice, Slide, Paste and Peat Creeks. Aside from 6311130 (which was not listed for closure repair, but we did survey) all the closures that we documented on this road system have been either removed or vandalized and are now allowing for vehicle access. Several of these spurs were used for the Bonanza Timber Sale and also lead to a wet, old-growth forest.

Both 6311140 and 170 have numerous stream crossing issues. The Slide Creek crossing on 140 is almost entirely plugged, causing major pooling on the inflow. It has been diverted and appears to flow over the road in high flow periods. A culvert near or at the Sluice Creek crossing has a beaver dam blocking the inflow and causing major pooling and potential overflow.

170 runs along an active stream by about 10 ft. The Paste Creek crossing has an outflow drop off of about 2 ft., causing pooling. This may be due to the poorly positioned culvert, not aligned with the path of the creek. Other culverts on this spur are plugged.

We have concerns about the use of old skid trails and skyline corridors. For instance, Unit 36 has at least two significant snags in the existing skid trail. The logging of these snags, degrading important rare habitat in the area would be entirely inappropriate. If these snags become deemed “hazard trees” and are slated to be logged, the skid trail


snags in unit 36 that are currently along spur roads

should not be built there. In addition, we witnessed a high density of skyline corridors along the steep slopes of several of the units. They remain narrow clearcuts, with little regrowth. Considering there is a high density of roads, a powerline and plans for the pipeline corridor in the area of Rethin units, Bark requests to see whether new skyline corridors will be necessary in the Environmental Assessment. These linear cuts through the forest create habitat fragmentation, lead to increased erosion and sedimentation and promote the spread of invasive plants, among other impacts.

LOGGING IN LATE-SUCCESSIONAL & RIPARIAN RESERVES

The Proposed Action would include logging in three units (27, 33 and 35) that contain Late-Successional Reserve (LSR) designation. The forests would be thinned down to a relative density of 20 in some cases. Because the units have not been marked with leave or take trees, we cannot comment on where this will occur, however Bark does not support the commercial timber program being a vehicle for restorative thinning in LSR. There are trees that are over 20 DBH in the LSR units and they should be marked prior to logging. The deterioration of these late-seral features is not permitted under the Northwest Forest Plan.

In the Proposed Action, it is stated that "if larger trees need to be cut for skyline corridors, skidtrails, landings or temporary roads they would be left in place." (PA, 11) There are currently skyline corridors, skidtrails and landings through the units with LSR forests. The PA does not provide maps with proposed routes. Large trees, particularly hardwoods such as Big Leaf Maple, do exist in the project and there is seemingly no purpose for the loss of these trees. Logging old trees for the purpose of yarding other trees in order to comply with the recommendation that old trees should be promoted is contradictory and will adversely affect the ability of the forest to recover. There are hardwoods present in some of the units that would be threatened by the proposed logging. Any and all hardwood needs to be protected. Unit 35 in particular has mature broad-leafed maple near to the riparian buffers, which are currently not marked.

THREATENED FISH HABITAT

Bark requests that Unit 29 be dropped from the Rethin Timber Sale. Pot Creek flows through the unit and is not only a fish-bearing stream, but is adjacent to Listed Fish Habitat for Lower Columbia River steelhead, Upper Willamette River chinook salmon and Lower Columbia River coho salmon. (PA 29) The 100-ft buffer proposed is not sufficient. The unit is downriver from Road 4660, which already has a frequent visitor use and crosses three feeder creeks to the Clackamas River in less then a mile.

RESTORATION FOR FUTURE LOGGING or FUTURE ECOSYSTEMS?

After visiting the Rethin Timber Sale we do not understand how the Forest Service intends to comply with all the purpose and needs proposed. Most of this timber sale is not made up of thick, overgrowth forests. Rather many of the units have an average spacing of approximately 20-25 feet. **How will the Forest Service be able to leave down wood from tree felling and create a viable timber sale?** Please refer to our photo page attached for more images from the sale.

unit 36, what's left to take?

We witnessed several years worth of girdled trees for snag creation. Although, this timber sale does not have a proposal for additional restoration efforts, we find the PA to be incomplete in describing the restoration efforts that have recently been put towards these forests (at $3,900 an acre (PA 19) or the impact that logging will have on the success of this already questionable restoration tactic.

Effective management of decadence in the forest has been demonstrated to not be a simple matter of mechanical snag creation as currently planned. Concentrating on the development of decadence within living trees has shown to be appreciably superior to simple mechanical tree death if snag usage is to be linked with "biological potential" and other Forest Plan management goals. Primarily this is due to the significant role of the pileated woodpecker, the primary cavity excavator of our Pacific Northwest forests. This species has been described as a "keystone species" due to its pivotal role as a habit modifier in the forests of the Pacific Northwest because it is the only animal "…capable of creating large cavities in hard snags and decadent live trees."

A wide array of species, including many that are of management concern in the Pacific Northwest, use old pileated nest and roost cavities. In addition, pileateds provide foraging opportunities for other species, accelerate decay processes and nutrient cycling, and may facilitate inoculation by heart-rot fungi and mediate insect outbreaks. Because of the potential keystone role of pileated woodpeckers in Pacific

Northwest forests, it may be appropriate to give special attention to their habitat needs in forest management plans and monitoring activities. (The Pileated Woodpecker as a Keystone Habitat Modifier in the Pacific Northwest; Aubry and Raley; PSW-GTR-181; 2002)

Setting a short-term numerical target for immediate mechanical snag creation, while potentially tempting due to its simplicity, should be avoided due to its lack of effectiveness in truly accelerating the restoration of the "biological potential" of late-seral characteristics in a forest. Decadence management that concentrates on elements of wood decay within living trees is more appropriate due to its importance to management species of concern and the lengthy timelines needed for this essential late-seral/mature forest characteristic to develop.

A number of snag creation studies have shown that for creating snags that would be used by pileated woodpeckers, simple girdling or topping are not effective:

- http://www.eglimpse.org/Assets/APNpdf/Deadwood%20Symposium/CHAPTERELEVENMANAGEMENT/056_Boleyn.pdf (of 1,267 snags, 85% were topped & 11% were girdled or inoculated, 1.5% of created snags showed pileated excavations)
- http://www.fs.fed.us/psw/publications/documents/gtr-181/014_Shea.pdf ("Six years after pheromone-baiting, 44 percent of the trees in both diameter classes had full cavities compared to no cavities in the girdled treatment groups…")

While the majority of snag creation studies lump pileated woodpecker usage together with other woodpecker use, doing so acts to obscure the specific relevancy of management actions on habitat needs of the pileated woodpecker and therefore on the keystone complex and the "biological potential" of the created snags and consequently on land management goals and management species of concern. As noted by Rose et. al. (2001):

> Woodpeckers, sapsuckers, and nuthatches are highly specific in their selection of tree species for nesting and roosting, and this selectivity is attributed to the presence of decay fungi.

What is it about the pileated woodpeckers that need specific management actions that are different from those of other, less "keystone" woodpecker species? It appears that the specific driver needed for snags to be of interest to pileated woodpeckers and consequently useful for other management species of concern is the presence of heartwood rot. As noted by Bull, 2002:

> Hollow trees are a unique structural feature in forests. Heart-rot fungi decay the heartwood in these trees while the tree is alive (Bull and others 1997). Ninety-five percent of pileated woodpecker roost sites in northeastern Oregon

were in hollow trees, and 5 percent were in vacated nest cavities (Bull and others 1992).

A strong relationship exists between the kind of decay in a tree and what species can use it, particularly for nesting and foraging.

If topping of trees is going to be pursued, it should be in addition to heart-rot inoculation and following the guidelines developed in the Siuslaw National Forest described by Rose et. al. (2001):

Trees topped above two branch whorls survive and develop new tops. Continued diameter growth in these trees provide higher values as wildlife snags. Large crooks formed in these trees also provide platform nest sites and create future breaking points to form a tall snag.

Girdling trees should not be performed since it kills the tree outright and weakens the structural integrity of the snag making it more likely to fall. As noted by Lindenmayer and Franklin (2002):

Girdling is problematic, however, because (1) sap rot occurs before heart rot, and (2) treefall can occur before there is sufficient top and heart rot to make the snag useful for cavities.

In addition to these snag creation concerns, we are not satisfied with the analysis of logging in dispersal habitat for the Northern Spotted Owl. "The project proposal involves the degradation and temporary removal of dispersal habitat for spotted owls." (PA 44) To reiterate, we do see the issue of snags becoming a very sensitive component to this timber sale. Snags are absolutely essential to the survival of most species in our forests. As identified in the PA, the project area is also the in the range of the Harlequin Duck which has Special Species Status. (PA 58) These birds' nesting and reproductive cycle is dependant on late-seral snags.

EARTHFLOW & LANDSLIDE RISK

Soil is not a renewable resource. All road building and logging, especially adjacent to riparian areas increases erosion. Sedimentation of streams is a concern for all watersheds but of particular concern within a Tier 1 Watershed. Soil compaction caused by road building and soil compaction due to heavy machinery such as tractors significantly reduce an area's growth and re-growth. We are particularly concerned about the impacts to soil in the Rethin timber sale. The soil is very lose and fragile. Any activity in these units will cause serious erosion of the nutrient-laden topsoil, further exacerbating any forest health problems that do exist.

Several of the units of the Rethin project are on very steep slopes and occur within "Earth Flow Area," with many areas which are documented as being Moderate to High Landslide Risk.

Steep Units of Particular Concern:
Units 32-35
Units 40-45
Unit 29

As requested in our scoping comments, **areas of High Landslide Risk should be identified on all unit maps, especially those within the Collawash watershed and considered in all Environmental Assessments.**

TREE BLOWDOWN

The scoping letter suggests that the trees are being thinned to reduce wind-damage susceptibility and yet the PA states that the current stands "appear relatively stable and windfirm." (PA, 25) We have seen inumerable instances of thinning projects affecting the blow-down potential of valuable habitat adjacent to the units and would ask to see studies to show that thinning will somehow mitigate the likelihood. If trees blowdown due to short-term increased wind-damage susceptibility, they will be unable to garner the assumed long-term benefits. Moreover, natural blow down taking place is already creating variable density with natural openings that allow more light to reach some trees.

INVASIVE WEED MANAGMENT MAY BE IMPAIRED

"It is highly likely that opportunities for spreading invasive plants across the landscape within the project area would increase. Increased traffic on Forest Service roads due to logging operations would likely spread weeks. Roads are conduits for the spread of weeds and vehicles are weed-spreading vectors." (PA, 94) The severity of invasive weed promulgation in Mt. Hood National Forest has been considered a major concern for Bark and concerned citizens for years and has recently been prioritized for management by the agency. While we appreciate the emphasis put on invasives in the Rethin PA, very little information was provided about what specific design features will put the project in compliance with management plan amendments from the Regional Invasive Plant ROD.

In addition, with regards to the *Site-Specific Invasive Plant Treatments EIS for the Mt. Hood National Forest and Columbia River Gorge National Scenic Area*, Units 17, 18 and 19 are proposed to overlap with sites designated for treatment. (Invasive ROD, Appendix 1-4) How, exactly, will the Forest Service ensure that this site does not become further contaminated with invasive species that the agency is currently allocating funds towards aggressive removal?

CLIMATE CHANGE MUST BE ACCOUNTED FOR

The evolving analysis on climate change within the EA process is an important benchmark in the future of public involvement. This has become a major point of concern, not just for the scientific community, but an issue that has squarely fallen within the public interest. We are encouraged to see the section on Climate Change steadily grow in analysis with each EA. We hope to see the agency continuing to

progress this environmental consideration for the advancement of the potential service forests provide in tempering climate change, rather than another speedbump to work around on the road to planning timber sales. Indeed, climate change issues contradicts so much of the commercial timber sale program, in terms of the economic benefits that logging provides for local communities. While it may not be appropriate to consider cumulative impacts at the global level, this countries' contribution to the crisis must be accounted for. Our indifference to setting market standards and regulation does not preclude government agency from utilizing the public resources, such as public lands forests. We do have to begin stabilizing our emissions. To throw our hands up and say, *This district can't bear the burden of a global crisis*, makes the Clackamas District just as complicit as the car commuter stalled out in traffic behind an empty city bus.

"Utilizing trees to create long-lived wood products sequesters carbon." (PA 103) is not an appropriate indicator for assessment. The No Action could imply that no products are ever made, because of recycling and reusing which ultimately have a much better carbon footprint.

In contrast to another affect claim, "Thinning to enhance growth of the residual stand would sequester more carbon than would occur with no thinning," Bark considers the science provided to be an incomplete view. How the federal forests are managed has a real and substantial impact on how much carbon is stored. Management-driven deviations from business-as-usual can lead to significant increases or decreases in carbon storage.

"Our analysis found that a 'no timber harvest' scenario eliminating harvests on public lands would result in an annual increase of 17–29 million metric tonnes of carbon (MMTC) per year between 2010 and 2050—as much as a 43% increase over current sequestration levels on public timberlands and would offset up to 1.5% of total U.S. GHG emissions. In contrast, moving to a more intense harvesting policy similar to that which prevailed in the 1980s may result in annual carbon losses of 27–35 MMTC per year between 2010 and 2050." (Depro, B., Murray, B., Alig, R., Shanks, A. 2008. Public land, timber harvests, and climate mitigation: quantifying carbon sequestration potential on U.S. public timberlands. Forest Ecology and Management. 255(3-4): 1122-1134)

ECONOMICS OF RESTORATION

As stated above, Bark does not believe that the Rethin PA is in compliance with NEPA's requirement to provide a range of alternatives. In particular, the consideration of other alternatives with regards to the LSR units is contradictory with the Northwest Forest Plan and the restorative guidelines.

An alternative was considered that would allow for more down logs to be added to the forest floor decay in order to achieve a recommended 10-15% ground cover as stated

in the LSR Assessment. The actions that are required to achieve this are prohibitive ($3,900 per acre). (PA 19) Simultaneously, a Purpose for the Rethin Timber Sale is to thin in LSR to excel the rate of growth in large trees. The PA claims that "the development of the proposed action considered the balance between providing down wood and accomplishing variable density thinning." (PA 19) Where did this consideration occur? Where in the many planning processes does the Forest Service hold these objectives up to an objective light to see where effective strategies do exist and where conflicts arise in Mt. Hood National Forest? The Forest Service has had multiple planning mandates to use as a vehicle for considering restorative action outside of the confines of the commercial timber sale program and, instead, opts to continue compartmentalizing initiatives, losing the holistic view of what is best for the forest. The Mt. Hood National Forest Land and Resource Management Plan (LRMP) is nearly ten years expired for its required revision. Bark is failing to see where the agency can account for where one hand's actions affect the other.

OFF-HIGHWAY VEHICLE AND TRAVEL PLANNING

The PA notes that Units 2 and 3 are "near" the proposed LaDee Flat OHV area. (PA, 21) To be more specific, they are ***adjacent and in*** the LaDee Flat OHV area. The roads that are a part of the proposed Rethin units are scheduled to be closed (decommissioned?) to the public through the Travel Plan process. A major concern surrounding the OHV areas is enforcement. Despite the environmental consequences of this clear cumulative impact, how does the Forest Service intend to enforce this closure? LaDee Flat is currently a site with some of the most prevalent illegal use by off-road riders in Mt. Hood National Forest. While containing this impact may be a solvent direction, Bark strongly encourages the Forest Service to cease logging within a mile of the OHV boundary and any road system stemming from a proposed OHV area until there is shown accomplishment in the Travel Planning process.

Thank you for considering our comments and concerns. More photographs from our groundtruthing can be seen at:
http://www.flickr.com/photos/barkformthood/sets/72157608407255145/

We will continue to update our visits to this proposed logging project through this site, additional groundtruthing forms and notes from our public hikes.

Sincerely,

Amy Harwood
Program Director
Bark

RELEVANT STUDIES:

http://www.fs.fed.us/psw/publications/documents/gtr-181/023_AubryRaley.pdf; The Pileated Woodpecker as a Keystone Habitat Modifier in the Pacific Northwest; Aubry and Raley; PSW-GTR-181; 2002

Depro, B., Murray, B., Alig, R., Shanks, A. 2008. Public land, timber harvests, and climate mitigation: quantifying carbon sequestration potential on U.S. public timberlands. Forest Ecology and Management. 255(3-4): 1122-1134

http://www.fs.fed.us/psw/publications/documents/gtr-181/023_AubryRaley.pdf; The Pileated Woodpecker as a Keystone Habitat Modifier in the Pacific Northwest; Aubry and Raley; PSW-GTR-181; 2002

Created Snag Monitoring on the Willamette National Forest; Bolyn, Wold, Byford; PSW-GTR-181; 2002

Girdled versus Bark Beetle-created Ponderosa Pine Snags: Utilization by Cavity-dependent Species and Differences in Decay Rate and Insect Diversity;Shea, Laudenslayer, Ferrell, Borys; PSW-GTR-181; 2002.

Long-term monitoring of wildlife leave trees in clearcut harvest units on the Siuslaw National Forest, Northwest Oregon, 1987-2000; Schreiber; Unpublished report. Siuslaw National Forest files. 29pp.; 2000.

Cavity-nester habitat development in artificially made Douglas-Fir snags; Brandeis, Newton, Cole; The Journal of wildlife management; vol. 66; 2002

The Value of Coarse Woody Debris to Vertebrates in the Pacific Northwest; Bull; PSW-GTR-181; 2002

Conserving Forest Biodiversity: a comprehensive multiscaled approach; Lindenmayer and Franklin, Island Press, 2002

http://www.fs.fed.us/psw/publications/documents/gtr-181/016_Bull.pdf

Wildlife-Habitat Relationships in Oregon and Washington, “Decaying Wood in Pacific Northwest Forests,” p580-623