



BARK

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October 11th, 2012

Dear Ian,

First off, I wanted to say thank you for posting a pre-scoping notice for the Lemiti Project. Bark works to ensure that the public can have full participation in the management of public forests and this pre-scoping notice is a great first step. While all the variables are not completely spelled out, the public at least has something to work with. This is especially important as the official scoping period is likely to commence when the project area is inaccessible due to snow levels. We would encourage the Forest Service to consider these type of notices for any projects in which NEPA may come forth at an inopportune time.

In light of that, I would like to share some of our preliminary findings in the Lemiti project area. While there are no units spelled out on the maps, in the following comment I describe the general conditions and locations to aid in the planning process. We have not yet been able to visit the entirety of the project, but plan to do so before the weather keeps us out. We will pass along further observations during the official scoping period.

We started our groundtruthing down 4230 which goes across the north side of the planning area. The first road encountered was 4230-033. This road is open and passable by vehicle. On the map it appears to stop short of the planning area, but I did not walk the road to confirm. This road does show up on the maps so I presume it is being looked at. I wonder though if there is any intent to lengthen the road to bring it into the beetle kill area?

The next road, 4230-034 is gated with a very beat up and rusty gate. St. Johns Wort, Tansy, and Ox-eye Daisy are all growing strong between the road and gate. There are also patches of invasives further in the roadway where Lodge Pole Pine (LPP) has not yet grown in on the road surface. No one has been down this road in years! The roadway itself contains 10 – 20 year old LPP. This road has essentially decommissioned itself, and it would be a shame to undo the ecological work nature has already achieved. In fact, when walking through

the area we often sought a linear line of dense LPP to figure out where the “road” was.

We then went down Road 4230-035, which was similar to Road 4230-034. We walked well into the planning area, and initially saw Shelterwood cuts and then nice stands of old-growth. These are within the planning area, but I assumed that they not part of the project – please confirm. I could see a linear path ahead of exclusively LPP where I turned around and the trees on both sides of the road were definitely old-growth. We are not sure how far this road would need to be re-built and/or extended to reach the beetle kill area? And how much it would cost to rebuild this length of road? And would the road itself have to be extended beyond its initial template to reach the area? It would be valuable for the public to see spelled out the cost of rebuilding these roads so that we could analyze the economic viability of the project.

While in the project area, I realized that if almost exclusively LPP are returning to the compacted, hotter microclimate created by the roads, won't salvage logging create a similar monoculture stand of LPP? Wouldn't the project simply create the very conditions it is claiming to remedy?

We got the answer when we headed back on 4220 heading south along the west edge of planning area. We stopped along the road where the dead trees started to appear. We initially walked into the forest and noticed that the edges of the roadway have been logged along 4220, presumably as a safety precaution since a lot of folks use the road to reach Olallie lakes. Amongst the downed trees was an exclusive, dense stand of young LPP returning to the forest. It begs the question: wouldn't this project create the exact same conditions that created the beetle kill in the first place? That by salvage logging the area the Forest Service will create another even aged stand of exclusively LPP?

We then walked down road 4220-125 and found a wetland just north of this road. On the map, it is where the unnamed creek peters out just north of this road. Essentially these are the headwaters of this creek, and at many points along this waterway the course diffuses into meadows. These meadows were rich with plant species such as Gentian, Osha, Spirea, etc.

Along 4220-131 there is another meadow that is wedged between this road and the creek that parallels it. We are concerned that by utilizing road 4220 -131 or 4220-125 that there would be resource damage to these meadows. In fact,

moving further down 4220-131 there are a few different spots where the creek diffuses into meadows. The pre-scoping notice mentions that one of the reasons for the project is to protect medicinal plants for the Warm Springs Reservation. These meadows often have the richest flora and are sites for numerous medicinal plants such as Gentian, Osha, Valerian, and Pedicularis spp.

It would be good to analyze exactly which medicinals the Forest Service is working to protect, so that the proposal can be sure to protect these resources, especially since most of the mentioned plants above thrive in wet meadows where fire risk is even less of an issue. In fact, most medicinals that I am aware of in the project area are shrub and forb plants that would be more severely impacted by logging than fire.

We then ventured down 4220-130, this road is open and in decent order, at least until it connects with 4220-125. After this point there are many points in which 4 inch deep ruts are running along the surface of the road, and the percentage of gravel in the roadway drops drastically. From the 4220-125 juncture until where the road is bermed, this road would require a significant amount of work to be used as a haul road.

We then walked 4220-130 to where the road is decommissioned. When you look at the Clackamas District ranger map the road ends where it does in reality: bermed before its crossing with Slow Creek. But on the planning maps the road extends all the way to the east end of the planning area. This is inaccurate. On the ground, there is a swath through the trees that once could have been a road, but it has not been used in a long time and has even more of a forest feel than roads mentioned along the north side of the planning area.

This brings me to one of the biggest concerns with the proposal. There is not an adequate road network to access the area. As mentioned, many of the roads that run along the north of the planning area are gated and passively decommissioned. Road 4220-130 only extends half of the distance suggested on the map. Outside this phantom road, there are no roads that go through the eastern portion of the planning area. As these are dead Lodge Poles that have been debarked and are all bleached out I can't imagine that the sale would go forth as a helicopter project. To rebuild all these roads would be an ecological setback, not to mention at a huge expense since it is unlikely that a biomass project would generate all the funds necessary to open, close, and potentially create all the roads needed to access the area.

Further, the stands immediately along road 4220-130 are diverse and growing in. Mostly Mountain Hemlock in the understory of the dead trees, though Noble Fir, Western White Pine, Doug-fir, and Western Hemlock are also present. Many of these trees are 10' to 20' tall. There is also LPP, but these are only 2' – 3' tall. It would seem that logging would tip the advantage back to LPP, especially since many of these trees returning would be damaged by a salvage sale. It would be in the best ecological interest to allow this diverse, shade tolerant community to arise beneath the dead trees.

Further, Lemiti Butte is directly south of road 4220-130. All along Lemiti Butte are healthy, diverse stands of trees. It seems that the natural order has created a diverse community of trees that included LPP but because they were amongst other species of trees were able to avoid the beetle outbreak. It appears that the stands of trees experiencing the heavy beetle kill are moving toward a diverse forest that would mirror the community on Lemiti Butte and likely avoid future Mountain Pine Beetle outbreaks.

The pre-scoping letter notes that “A large scale wildfire could impact scenery, recreation opportunities, forest ecosystems, watersheds, and wildlife habitat.” But this statement fails to acknowledge that logging will have these same negative qualities, which are definite while fire is speculative at best.

It is hard to see that this project will result in the long-term net benefits to fire proofing our forests either. The relatively long fire return interval makes the fire-modification benefits of treatment highly speculative. Many more acres will be degraded than are likely to be benefited with this proposal.

The fire regime in this project area is relatively infrequent which means that most treatments are unlikely to ever be affected by fire and have a chance to modify fire behavior before the forest regrows and becomes dense LPP again. These treatments are likely unnecessary and are unlikely to ever serve their intended purpose.

Furthermore, trees that are currently being killed by beetles are incrementally reducing the need for intervention with each passing year. Beetles help thin the forest of a singular aged and species of tree. The small fuels created by dying trees will break down over time and do not represent a serious fuel problem. In fact, these beetle killed trees have already dropped their needles and are no longer susceptible of spreading via crown fires. In a forest like this (with a

relatively long fire return interval), and the large fuels associated with the dead tree boles do not contribute to high fire hazard and are a non-issue. In fact, studies have suggested that the moisture stored in large wood might serve as a heat sink and reduce fire severity.

Lastly, the project area includes logging along portions of road 220-120 which leads up to the lookout tower on Sisi Butte. Sisi Butte has recently been designated as wilderness, and we are concerned that logging will impact the wilderness characteristics that such a designation is meant to protect.

Thank you so much for your time. Please let us know if you have any questions, or would like to discuss the project more.

Gradey Proctor

Forest Watch Coordinator, Bark