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Cindy Enstrom
Cascades Field Manager
BLM – Salem District
1717 Fabry Road SE
Salem, OR 97036

Submitted by email to alisa_tanner@blm.gov and cindy_enstrom@blm.gov

RE: Scoping Comments for the Take 3 Timber Sale (1790 ORS040)

Dear Ms. Enstrom,

Thank you for the opportunity to comment on the Take 3 Timber Sale. This project would log approximately 370 acres in the Eagle Creek Watershed, and construct/re-open miles of road.

Bark has nearly 5,000 supporters who use the public land forests surrounding Mt. Hood, many with a special affinity for the Eagle Creek Watershed. Bark supporters use the area 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. We submit these comments on behalf of our supporters and include by reference all comments received by our supporters.

Please consider our following concerns, questions and comments for the proposed Take 3 Timber Sale:

Cumulative Effects Analysis

The area surrounding the Take 3 project site has been heavily impacted by logging, especially on private lands. When Bark staff made a field visit to the site, we encountered active logging in Section 11 on north side of Eagle Creek, and observed clearcuts adjacent to many of the unit boundaries. In addition, the Forest Service's Eagle, Beagle, Talon & Claw sales, known collectively as Eagle, logged approximately 11 million board feet from the Eagle Creek watershed before being cancelled after 7 years of public outcry. The Eagle Creek Watershed Analysis recommends that only 10.2 million board feet of trees are removed per decade. (WA at 110). As this number has already been far exceeded, how can the BLM continue planning to remove timber from this heavily impacted watershed?

As this area suffers such a heavy impact from clear-cut private lands, this puts an even greater burden on BLM to provide healthy habitat. Please conduct a thorough cumulative effects analysis that recognizes the unique role of the BLM lands to provide healthy habitat in a sea of clear-cuts.

Rusty Saw

Section 11 overlaps the Rusty Saw thinning project – logged 6 years ago. Rusty Saw commercially thinned 127 acres, removing 3128 CCF¹, and renovated 13,255 feet of road. Bark appealed the Rusty Saw decision, and still has several concerns about the project and its implementation. We are very curious as to how Rusty Saw and Take 3 interact, and ask that you include a section discussing this in the EA.

In its Final Decision for Rusty Saw, the BLM dropped section D and decreased the acreage of section A by 24 acres. These areas both appear to be in the area affected by Take 3. Why were they dropped from Rusty Saw? And why are they now included in Take 3?

Roads

Eagle Creek is a Tier 2 Key Watershed, which requires reduction of road mileage and priority for watershed restoration, neither of which this sale accomplishes. Entire The Eagle Creek watershed has an average of 6.6 miles of road per sq. mile, and the N.Fork Eagle creek has road density of 4.4 miles/sq mile. As we argued in our Rusty Saw appeal, the Eagle Creek watershed already has a high road density and the BLM should not be building new roads or re-opening previously decommissioned roads. At that time, the BLM Field Manager responded that the BLM had no plans existed to increase miles of current roads on BLM lands.

Now, 10 years later when road density remains high in the watershed, the Take 3 sale would build at least four new road segments², and reopen several others that have been passively decommissioned.

For example, Road 3-5E-11.1 was passively decommissioned after Rusty Saw. The scoping map does not indicate that it needs road work, but our site visit confirmed that it will need significant work to be used as a haul route. It seems more than a bit ironic to reopen a road that you had to reopen 5 years ago, then close it again. How much expense to the BLM to keep opening and closing roads? How many other roads will need some amount of work to get them into hauling shape?

¹ The Forest Service and BLM use different metrics for assessing the volume of logs removed from a timber sale area, which makes it difficult to compare numbers, or understand watershed wide impact. This makes it all the more important for the BLM to review all the timber volume removed from the watershed over the recent past and analyze in the EA.

² The maps are unclear about this, as they say "potential Road Work" rather than "new roads", but our field checking found no road alignment or old skid trails in these locations so we assume they are new roads. Please confirm.

Bark requests an action alternative that includes no new road building.

Section 11

Bark is very concerned about the proposed logging and road construction in the NE corner of Section 11. The eastern boundary is directly adjacent to a recent clearcut and is heavily impacted by blowdown. At the same time, it is a healthy, well spaced forest, with many large downed woody debris in advanced stages of decay, and large legacy stumps and snags that would be heavily impacted by road building. Also, there is a wide section of seeps full of wet area plants, including skunk cabbage, oxalis, etc., on the eastern border of the creek extending several hundred feet towards the hillslope. The buffers necessary to protect these seeps are much larger than the small riparian buffer drawn on the scoping map. We advise the BLM to drop this portion of the sale, as the ecological impacts of roadbuilding and yarding far outweigh the small amount of valuable timber in the section.

Other areas of Section 11 contain more even aged stands, especially on the east side of 3-5E-4, that Bark would not oppose thinning.

We are curious as to how you propose yarding the eastern most portion of the southern section in 11? It seems a bit far from any roads, and we encourage you to drop any portions that cannot be accessed by road 3-5E-11.1.

Section 13

Bark volunteers identified a very healthy forest patch in the southwestern unit of section 13, bordering the headwaters of Little Eagle Creek. They found many snags up to 4' dbh, abundant CWD, well-spaced trees with well developed undersory that includes many hardwoods, oxalis, bleeding heart, lady ferns, and salmonberry which all indicate wetter soils than rest of unit. Please do not include this area in the final sale prescription.

Field checking also uncovered signs of illegal OHV use throughout Section 13. How will agency work to address this, especially with building additional access roads? In addition, the Eagle Creek Trail road really needs signage and a road closure after the 3-5E-13.4 spur. When we visited the area (on June 14), we observed illegal OHV use of this trail with fresh tire marks leading into the Salmon Huckleberry Wilderness. There is no legitimate reason not to have a gate or berm immediately after the 3-5E-13.4 spur. Please include this in your proposed actions.

Snags

Rusty Saw EA noted that there was a very low quantity of snags and down logs in the project area, and concluded that “the effects on these features will be high.” *Rusty Saw EA at 29*. Please explain if and how this has changed since the Rusty Saw project, and if not, how the Take 3 sale will affect the too few snags and CWD already impacted by Rusty Saw.

Survey & Manage Species

When the BLM surveyed for the Rusty Saw sale, it found six species of Survey & Manage mollusks in the project area. Please ensure that similar surveys occur for Take 3, and that you include information about management strategies in the EA.

Are there other Survey & Manage or Bureau Sensitive species in the project area? If so, please provide detailed descriptions of the management practices the BLM will use to ensure minimal impact from this project.

Public Access Issues

Like many BLM timber sales in the “checkerboard”, Take 3 presents access issue to the public, especially in Section 11. The road going into the unit off Wildcat Mountain Rd has a sign to keep public out, and states that the road may be closed at any time. Bark volunteers had to risk trespass charges to access our public land and field check this sale. How can the BLM help ensure the public has access to this area for future field-checking and monitoring?

Also, the scoping maps sent out were insufficiently detailed. We do not understand why you cannot include detailed maps with the initial scoping notice, rather than creating both more work for the public, and a time lag as we wait for useful maps to arrive.

Monitoring

Many Environmental Assessments contain numerous “best management practices” and “project design criteria” that ensure the reader that whatever impact the project may have will be minimized by following these practices. In the Take 3 EA, Bark requests that the BLM include a monitoring plan that details exactly how the BLM intends to ensure these BMPs and PDCs are followed at every step of project implementation.

Thank you for considering our initial thoughts on this timber sale. Please contact me with further questions or clarifications.

Sincerely,

A handwritten signature in black ink that reads "Brenna Bell". The signature is written in a cursive, flowing style.

Brenna Bell, Esq.
NEPA Coordinator