

Brad Keller, Field Manager, Cascades RA

Salem BLM

1717 Fabry Rd. SE, Salem, OR 98306

I am writing to comment on the Turnridge Timber Sale Environmental Assessment.

1) I am very concerned that the preferred alternative calls for aggressive logging in mature forests. We should not be logging in mature or old growth forests. We should not be logging in our last native forests. In September 2001, a group of scientists wrote Region 6 stating that based on new scientific evidence, there should be no more logging of mature and old growth forest ecosystems. I am concerned this information has not been adequately considered.

2) Cumulative Impacts: There is very little older forest left in the Rock Creek Watershed. Much of the land there is state and private and managed on short rotations. The forests in the Turnridge area contain some of the best late-successional forest around. I do not believe the EA adequately discussed the cumulative impact for cutting these sales.

3) Unit C-2. This is the only unit in the Connectivity/Diversity Block, in which the Salem BLM Resource Management Plan says that forest practices should be modified to recover old-growth conditions to provide for connectivity habitat between Late-Successional Reserves and maintain legacy structural components like snags, coarse woody debris, plant diversity, and variable stand densities. (RMP p. 21, 48). **This grove contains some of the largest trees in the North Santiam watershed, with one tree measuring nine feet in diameter.** It has lots of existing diversity of tree types, the most down-woody debris of any unit in the sale, and the most open canopies of any unit in the sale (it was thinned in the 1980's). This forest could grow for decades before the canopy closes. **Right now this area is proposed for clear-cutting. I demand that this area be dropped from the proposed sale area!**

4) Spotted Owls. Portions of unit D-6, A-1, and B-1 are within the provincial home range radius (1.2 miles) of active northern spotted owl sites. 27 acres of suitable habitat would be destroyed and 86 acres would be degraded. This project "may effect, likely to adversely affect" the spotted owl. Please drop all units that are "likely to adversely affect" the spotted owl.

5) Red Tree Voles. I do not believe the BLM did an adequate job surveying for Red Tree Voles in this area. I understand you are currently re-doing the surveys. I expect that this new information will significantly change the proposal.

6) New road to unit B-1. There are too many roads on our public lands. Bark recently released a report on the state of roads in the Clackamas River Ranger District of Mt. Hood. It found that 25% of the roads that were supposed to be closed were not. Both the BLM and the Forest Service continue to build new roads, even though you do not have the funding to maintain or adequately close. With what funding do you plan to decommission this road? You did not analyze the current road density. What will be the

cumulative effect of this road? Even temporary roads have cumulative impacts. They impact the area as they are being built; they impact the area even after they are decommissioned, and often they are continued to be used by ORVs. What plan do you have to address ORV usage? If you have to build a new road to get to an area to log within the Turnridge sale, the area was not meant to be logged. Leave it alone and build no new roads.

Sincerely,

Sarah Wald
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