



BARK

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January 21, 2010

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

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

RE: Scoping Comments for the Airstrip Timber Sale (5410 ORS040)

Dear Ms. Enstrom,

Thank you for the opportunity to comment on the Airstrip Timber Sale. This project would log approximately 277 acres in the North Fork Clackamas River, including 48 acres of regeneration harvest (clearcut). Logging will occur in Riparian Reserves and in area eligible for Wild & Scenic River status.

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. 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 Airstrip Timber Sale:

1. Include an alternative that does not include regeneration logging

At this time, we were not able to access Unit 7A where regeneration harvest is proposed. The road that may provide access is gated and otherwise, the North Fork of the Clackamas River would need to be crossed. From Google Earth images we can see that this unit is adjacent to existing clearcuts and further extend the impact that these areas are having degrading wildlife refuge and habitat, sedimentation in the North Fork Clackamas River watershed and continued presence of roads. We are strongly opposed to regeneration harvest on public lands. **We ask for an alternative to be analyzed that does not include regeneration harvest.**

2. Roads

The scoping letter makes no comment about additional roadbuilding. However, there is currently no access to Unit 7A, which would imply that temporary road construction will need

to be include in this proposed action. We fully expect that this will be included in the forthcoming Environmental Assessment, in order for the public to have input. The current road density in the North Fork Clackamas River is at a level determined to be obstructive to salmon restoration efforts. The Fall Creek and Bee Creek subwatersheds have 6.02 mi/sq mile and 3.68 mi/sq mile, respectively. (North Fork Clackamas River WA, p 5-6) These subwatersheds are just upriver from the project area. Sediment load from these subwatersheds need to be considered in the EA as they will continue to impact the North Fork Clackamas River into the future.

Additionally, we strongly encourage the BLM to discuss the appropriate access into units such as Unit 18A. The best access point is a private road that is gated and signed with trespassing warnings. Assuming the BLM will be gaining permission to use these roads for the timber companies, should logging occur, the agency must also gain public access permission for the comment periods. Please make this clear in the forthcoming EA.

It was also noted that there are several non-functioning culverts on Road 4-5E-7. Streams are crossing over the road, raising concerns about deterioration of the road and increased rate of toxins going into the waterways. We expect this road to be repaired before use and highly recommend it be considered for removal after the completion of any actions under this proposal.

3. Incorrect age assessment

We had two groups of volunteers visit Unit 7B and both returned with the same report that the age class noted in the scoping letter and attached Forest Age Class Map is incorrect. They found many Douglas Firs with a 30" DBH and even some that were between 40-45" DBH. Additionally, there was a Western Hemlock and Western Red Cedar understory that would imply an older stand than just 10-30 years. They did not see the overstocked, plantation stands that federal land managers will often attempt to thin out and promote tree growth.

4. Proximity to other timber sales

Section 7 is also in close proximity to the No Whisky Timber Sale on the adjacent Forest Service lands. Bark had a high level of involvement in this timber sale, completing substantial groundtruthing of the proposal. At the time we were also members of the Clackamas Stewardship Partners, a collaborative stewardship group. This group had decisionmaking authority over the expenditure of returned receipts for renovation work in the North Fork Clackamas River watershed. Most of these funds were allocated to Off-Highway Vehicle (OHV) mitigation and road closures. Our deep investment of time and resources in this process has given us helpful perspective in the tenuous success for recovery of this drinking watershed. We expect to see all of these adjacent resource demands included in the analysis of the Airstrip Timber Sale's cumulative impacts. Additionally, we hope to see a commitment to monitoring the effects of such potentially destructive actions.

5. Presence of older hardwoods and decadent features

In the riparian area of Unit 7B, there are numerous stands of old growth hardwood maple trees. How does the BLM plan to ensure that these stands remain standing and functioning as the important soil enrichers and canopy structure that they are currently providing?

Additionally, this forest does have a presence of decadent features. We noted downed trees of various decay stages, as well as large standing snags. There are ample signs of woodpecker presence in the snags and a pileated woodpecker was heard on one visit. These snags provide vital refuge and forage for birds. We fully expect that they will be given buffers and avoided by any corridors created for skyline yarding or roadbuilding.

6. Steep slopes in planning area

Our volunteers have expressed great concern for the steepness of the slopes, particularly those in the Riparian areas. The North Fork Clackamas River basin and the Roaring River basin both share the unique land formation that creates the La Dee Flat; very steep slopes and high levels of sediment load. We expect this to be included in the forthcoming analysis.

7. Presence of invasive species

Volunteers noted a high presence of invasive species. The BLM and Forest Service have been implementing extensive plans to control the spread of invasive species. There have been numerous studies showing a direct correlation between logging operations and the spread of prolific invasive species such as scotchbroom, holly and thistle. What measures will the BLM take to minimize the potential for these species to spread further than their current presence? Please state recent examples of success from other timber sales in invasive species prevention.

8. Proximity to La Dee OHV Area

We have included a map of the proposed La Dee OHV area. Bark has been heavily involved in the Forest Service OHV planning process. We believe that all adjacent logging operations must include the potential for illegal use from opened forest floors and roads built for or opened to logging operations. Off-Highway Vehicles have been known to increase sedimentation from stream crossing, promote the spread of invasive species, disperse wildlife from their preferred habitat, impact other recreation users with noise and safety risks, as well as other valid concerns about their wide-use presence on public lands. Although there appears to be minimal use in the areas we were able to visit, we have concerns that OHV users using the North Fork Road to access La Dee Flats will eventually expand into other, less regulated areas, such as the adjacent BLM sections of the forest.

9. Forest species diversity

The forests that were visited by Bark volunteers host a surprising species diversity that we do not want to see threatened by commercial logging practices. In the two visits, volunteers noted the following plant species:

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|----------------------|--------------------|-------------------|
| Red Huckleberry | Pipsissewa | Sword Fern |
| Bracken Fern | Wild Rose | Vine Maples |
| Evergreen violet | Cat's Tongue Fungi | Douglas Fir |
| Ocean Spray | Horsetail | Western Red Cedar |
| Licorice Fern | Oregon Grape | Pacific Yew |
| Saxifrage | Wild Ginger | Western Hemlock |
| Golden Chinkapen | Salal | Madrone |
| Puffball Mushroom | Maidenhair fern | |
| Rattlesnake Plantine | Sedges | |

In addition, we expect to see full analysis of impacts to the threatened and endangered fish in the North Fork Clackamas River. At least, three endangered or threatened fish species occur in the North Fork Clackamas River drainage: Lower Columbia River steelhead, Upper Willamette River Chinook salmon, and Lower Columbia River coho salmon. Native rainbow and cutthroat trout are found in the upper North Fork Clackamas River and its tributaries. The lower stretches have winter and summer steelhead, rainbow trout, coho salmon, and spring chinook salmon.

10. Wild and Scenic River eligibility

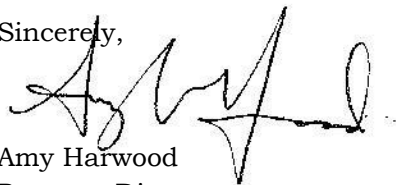
We expect to see a full assessment of how this timber sale will degrade the potential for the North Fork Clackamas River to receive Wild and Scenic River status.

11. Climate Change

As you know, Bark has been involved and commenting on the Gordon Creek Timber Sale. The BLM recently retracted the original EA for the timber sale to update the climate change and carbon analysis. The updated EA included a more lengthy discussion about the impacts from and on climate change and carbon storage/sequestration. We are glad to see the BLM taking this initiative and fully expect to see continued improvement and inclusion of this burgeoning scientific field.

Thank you for considering our initial thoughts on this timber sale. We have included a few supporting documents; photos from recent visit to the timber sale, a map of the La Dee OHV area and a Google Earth view of the project area that offers helpful views of adjacent forests (or lack of.) Please contact us with questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Harwood', written over a white background.

Amy Harwood
Program Director