

Cascadia Wildlands we like it wild.

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February 17, 2010

Cindy Enstrom, Field Manager
Cascades Resource Area
Salem BLM
1717 Fabry Road SE
Salem, OR 97306

Re: scoping comments on the Airstrip Project

Dear Cindy Enstrom:

Please accept the following comments from Cascadia Wildlands about the Airstrip Project. Cascadia Wildlands is an Oregon-based non-profit conservation organization with approximately 1,000 members throughout the Pacific Northwest. Our mission is to protect and restore wildlands and species in the Cascadia bioregion, and our members, staff, board, and countless volunteers and supporters regularly use the forests and waters of the Cascades Resource Area of the Salem BLM District. We enjoy hiking, camping, skiing, boating, hunting, fishing, wildlife observing, and generally seeing and experiencing our public lands in their natural condition.

The Airstrip proposal includes treatment of approximately 325 acres of 40-70 year old forest stands. 277 acres within the matrix and riparian land use allocation are being considered as well as regeneration harvest on approximately 48 acres in matrix (also in the eligible North Fork Clackamas Wild and Scenic River Corridor). Below are general comments on the project proposal.

Regeneration Harvest

Regeneration harvest is an archaic silvicultural method with a primary goal in this case of maximizing timber volume. Clearcutting emits vast amounts of greenhouse gasses, degrades habitat, displaces soil complexity, invites non-native species and lacks public support. Public feedback on the BLM's recent Western Oregon Plan Revision (WOPR) should have clearly demonstrated there is little support for this harmful practice. It is time for the BLM to once-and-for-all move beyond clearcut logging.

Some of the BLM districts have begun a collaborative approach in the post-WOPR era. Clearcutting is a non-starter for collaboration. We implore you to consider an alternative in the forthcoming NEPA document that does not include a clearcutting component.

Thinning

The Airstrip proposal calls for thinning in plantations in the matrix and riparian land use allocations. Cascadia Wildlands actively supports thinning dense young tree plantations if done in a restorative and unobtrusive way. We encourage the BLM to not just thin for volume, but consider habitat restoration as the driving factor behind the project. Variable density thinning with skips and gaps should be worked into the prescriptions. Varying the intensity of thinning creates a patchy variety of conditions of heat, light, wind, moisture, competitive stress, and hiding cover within the stand and the landscape, and sets up the stand to more quickly develop late seral characteristics.

The end goal of thinning should be measured in terms of acres of habitat restored rather than board feet generated. Recent science suggests that variable density thinning is the most expeditious way to transition homogenous Douglas fir tree farms into more complex habitat. For more information on variable density thinning, see studies by Carey, Tappener and Poage.

This approach to forest management on federal land on the Westside over the past 5-10 years has garnered wide public support and avoided controversy and legal gridlock. We encourage its application on plantations forests on the Salem BLM District. Please consider an alternative that emphasizes variable density thinning as the primary silvicultural prescription in the Airstrip Project.

The map included in the scoping notice shows forest in the 80-130 age class will be logged in the northeast section of 18. However, the scoping notice suggests only stands 40-70 years old will be targeted. We encourage you to drop any mature, fire regenerated stands from the logging proposal and instead focus exclusively on the plantations.

In implementing the thinning prescriptions, the BLM should consider that designation by description (DxD) discourages clumpiness and tends to create more homogenous stands by taking out all the conifers between the leave trees. The BLM should make efforts to retain clumps of trees growing together in contracting guidelines to avoid homogeneity in the stands and avoid overthinning stands. This will assist in accelerating the development of older forest structure critical for a number of older forest dependant species.

Road Building, Decommissioning and Storage

The scoping notice does not offer any details about road construction or decommissioning other than: "Other potential activities include development, maintenance and management of transportation systems to meet needs identified under various resource programs (ie construction, renovation, or decommissioning for habitat improvement, maintenance of water quality or recreation in conjunction with thinning)."

We encourage the BLM to reuse old roads that were built to access the units the first time they were logged and then fully decommission them after use. We discourage the building of "temporary" or permanent road as part of the proposal. Temporary and permanent roads may have long-term impacts including, but not limited to, spreading noxious weeds, creating trash dumps and meth labs, and inviting unwanted OHV use in the area. Please consider an alternative in the EA that does not build any new temp or permanent road.

Aquatic Conservation Strategy and Survey and Manage Strategy

Please ensure this project is in compliance with the nine objectives of the ACS and follows the proper protocols of the 2001 Survey and Manage Strategy of the Northwest Forest Plan, including surveying for the elusive red tree vole. Recent efforts to modify or remove Survey and Manage requirement have been found illegal by the District Court.

Eligible North Fork Clackamas Wild and Scenic River

Please consider an alternative that avoids clearcut logging in the eligible Wild and Scenic North Fork Clackamas. An eligible Wild and Scenic River makes it a candidate for inclusion into the Wild and Scenic River System enacted by Congress. The BLM should instead act in the public interest and protect this unique area through an administrative move until it can be designated by Congress.

Carbon Release

Please disclose the impacts the project has on global climate change in terms of carbon dioxide released from logging operations in your cumulative effects analysis.

Thank you for considering these comments. Please continue to send us hardcopy NEPA documents related to the project as they arise. If you have any questions, please do not hesitate to call.

Sincerely,

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

Josh Laughlin
Conservation Director
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