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Rudy Hefter
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Project Leader
Salem BLM
1717 Fabry Rd. SE
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November 16, 2004

Re: Annie's Cabin and Missouri Ridge Projects

Dear Rudy Hefter and Steve Dowlan,

Thank you for the opportunity to comment on the Annie's Cabin and Missouri Ridge Projects. I was not able to see the Missouri Ridge Project, due to an impasse with private land access. However, I am heading out the field with Steve Dowlan on Wednesday, November 16, 2004. After I have this chance to look at the proposed units in this project, I will submit comments on that sale. Per a conversation with Steve on Monday, November 8, the comment deadline would be extended to allow me to view these areas and provide input. I will, therefore, devote space here to solely to Annie's Cabin.

Annie's Cabin is a 1,260 acre project planned in the Molalla River Watershed. Stands have been identified by the BLM to range from age 30 to 80 years old. Most of this project would take place in the Molalla River/Table Rock Special Recreation Management Area (SRMA). Bark has numerous concerns about this project, which range from impacts from road building to the affects on recreational opportunities. Much good will has been built up between local community groups, such as Molalla River Watch and the BLM over the years in relation to this area. Thousands of volunteer hours have been devoted to restoring the area to a place of scenic beauty and environmental viability. Proceeding with this project has the potential to destroy not only good will but a much beloved landscape that is just beginning to heal.

ROADS

One of our main concerns involves potential road building and reconstruction that could be required to log the area. Roads, even if "temporary" by description, have significant affects on the environment. There is abundant science dealing with the adverse affects of roads on wildlife and watersheds. This comes in the form of habitat fragmentation, soil compaction, sedimentation, introduction of invasive weed species, increased likelihood of off road vehicle abuse, and increased risk of fire, to name a few impacts. We strongly oppose any action that would involve building new road or reconstructing old roads which

have begun to revegetate. The road density in the planning area is already high. There is also already a high risk of sedimentation due to ongoing winter use of trails from stock and mountain bikes. The day I was in the field in early November, there were muddy pools on many of the trails, and several were closed due to poor conditions. A high priority of the BLM should be to reduce impacts from roads through decommissioning ripping and restoration, turning more road miles to trail miles, not building new roads.



Drainage problem on existing trail

RECREATION

Most of the project would take place in the Molalla River/Table Rock SRMA. This has been designated, per the Salem District RMP, for recreation activity and experience opportunities. One of the prized features of this SRMA is the Shared-Use Non-Motorized Trail System. As your scoping document states, many partners and volunteers have played a critical role in developing and managing recreation opportunities in the area. There is no doubt that the quality of recreation will be negatively impacted by logging. On a basic level, recreationists will be inconvenienced by the logging operations, and affected by visual impacts, and noise. The quality of recreation will be diminished for years to come. This area, which is surrounded by private lands, provides a rare recreational opportunity for local community members. It also is an attraction for people from surrounding communities. There is great potential for the City of Molalla to use this trail network as an attraction with great benefit to its local economy, and this potential should be explored in an economic analysis included in a NEPA document. Logging this valuable recreational resource would interfere with this potential.

WILDLIFE

During my visit to the area, I noted numerous animal tracks. This area is obviously heavily used by wildlife, particularly deer. There is also a healthy population of fungi and mollusks. BLM's NEPA analysis needs to include information on the role this planning area plays for wildlife, and in particular its role as a migration corridor for species. What animals rely on this area? How fragmented is the surrounding landscape? Is this the last viable habitat in the vicinity for native species?

CUMULATIVE EFFECTS AND SURROUNDING PRIVATE LANDS

From the project area, facing east, it's easy to see large scale clearcuts across the Molalla River. This area has a history of clearcut logging, and much of the private surrounding land is in a fairly short rotation. More information is needed about the nature of private land, past management history and future management plans. How much land is in Weyerhaeuser ownership and what is their plan in the near and mid term for their holdings?

SOIL

A number of the areas marked for logging are on very steep slopes. What will the impact be on the soil? What will the cumulative impact be on soil from existing and proposed roads? From additional skid trails?



Fresh clearcut at top of hill. Older clearcut in foreground. Eastern slope of Molalla River Watershed.

INVASIVE WEEDS

Invasive weeds have the potential of being a serious problem in the planning area. Scotch Broom is visible along the Molalla Forest Road in areas that have been disturbed in the past. Invasive weeds have become such a problem in the region that the Forest Service is proposing a large scale EIS to address the issue. Central to solving this problem is halting activities that further perpetuate the conditions where invasive weeds thrive. Logging equipment and exposed soil mean more vectors for invasive plants. Once introduced, they are very difficult to eradicate. This issue should be given serious attention, particularly given the influx of vehicles, bikes and humans in this area.

SNAGS AND PRE-COMMERCIAL THINNING

Due to past management involving clearcutting, this area has few large downed logs and little downed woody debris on the forest floor. However, there are signs that the forest structure is beginning to change as trees in denser stands are falling over and creating openings in the canopy. If left alone, this process of natural selection will result in downed woody debris and increased growth rate for nearby trees no longer competing for resources. I explored the northern section of the planning area, and saw a few stands which were extremely dense and devoid of undergrowth. These areas could benefit from some pre-commercial thinning to increase the rate of down woody debris on the forest floor and decrease competition. However, the majority of the stands I visited had a lush and diverse array of undergrowth species, with a healthy amount of space between trees. Bark supports selective pre-commercial restoration thinning as the best solution for these very dense stands.



Tree falling over all by itself,
opening up the canopy

OLDER STANDS

In the areas north of the intersection of the Huckleberry Trail and the Rim Tie Trail, there were numerous larger trees. A few measured 10.6 feet in circumference. Many were 6 feet circumference. These older trees are probably very rare in the watershed. What information do you have about late Successional stands in the watershed? What percentage are they in the watershed? What role are these trees playing as habitat? What is your plan for them? It is imperative that we have detailed information on each stand and the rationale for the proposed prescription for each stand.



Older tree in project area. What's
the plan for this tree?

RIPARIAN AREAS

Several riparian areas are marked for treatment, some of them very steep. I also noted riparian areas that were dense with hardwoods but not dense with conifers—a natural evolution of an area that has been logged and is in recovery. Some of these areas were also already very open due to blow down. What is

your proposal for the riparian areas? We are concerned that logging will increase sedimentation and is a risk not worth taking when this area is healing well on its own time.

Based on our above concerns, Bark asks that you cancel the Annie's Cabin project. We feel that for all of the reasons state above that this area is incompatible with commercial harvesting. The best and highest use of this area is for recreation and native habitat.

Thank you for considering our comments.

Sincerely,

Sandi Scheinberg
Executive Director