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Jim Roden
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RE: Comments on the Lake Branch Thinning Preliminary Assessment

Dear Jim:

Thank you for the opportunity to comment on the proposed Lake Branch Thinning. As you know, timber projects on Mt. Hood National Forest is of great interest and concern to Bark's supporters and we continue to be engaged in order to ensure that all environmental rules and guidelines are followed in the interest of the public.

Since 1999, Bark has advocated for the ecosystems of Mt. Hood National Forest. Our mission is to bring about a transformation of Mt. Hood National Forest into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation. As of writing these comments, we represent over 5,000 Oregonians who support our mission.

Unfortunately, we have not been able to visit all units of this 2,163 acre timber sale since the Preliminary Assessment (PA) was released thirty days ago. We have attached some of the survey forms that were filled out since we have visited the project area. In addition, we have incorporated some images that were captured while groundtruthing the area.

We were disappointed to find once again, that despite an open public comment period, the Forest Service has done virtually no marking or flagging for this timber sale. We understand that with such a large project, this could be an arduous and time consuming exercise, however we see it as a necessary component to communicating the intent of the project to the public. At times we have been told that interagency communication for project planning utilizes GPS points and GIS shape files. Having this information provided on the Mt. Hood National Forest website would be a step in the right direction if the agency plans to phase out flagging timber sales. In particular, use of .kmz files gives people the opportunity to view the boundaries of a project over

aerial images using the free service of Google Earth. However, we do not consider this nearly as effective as taking the time and resources to flag the boundaries, leave/take trees and survey points of a timber sale.

The Lake Branch Thinning Project brings up questions about why road repair and decommissioning is falling under a timber sale? The Forest Service has taken a commendable step forward towards transportation planning and reducing an unmanageable road network. How does the road work included in this PA relate with the Aquatic Restoration projects?

Congress has recently provided direction that all national forests identify a minimum road system as part of the travel planning process. The Omnibus Appropriations Act of 2009 specifically directed the Forest Service to conduct an appropriately-scaled roads analysis and identify a minimum road system.

“The Committees on Appropriations expect that each individual National Forest or Grassland will comply fully with all travel management regulatory requirements, particularly the science-based analysis in 36 CFR 212.5 (b)(1), the identification of unneeded roads in 36 CFR 212.5(b)(2), and the criteria for designation in 36 CFR 212.55(a) and (b). The Committees expect the Forest Service to identify priorities, and associated resource requirements, to fully comply with the regulatory requirements of 36 CFR 212.5(b) (1) and (2).”

Both House and Senate versions of the FY2010 Interior Appropriations reference travel management planning and the need to look at the entire road system to evaluate those that are unneeded or causing harm to the environment. Congress’ intent is clear that the agency should be assessing all maintenance level 1-5 roads, not just the ML 3-5 roads that are typically used by passenger vehicles. Furthermore, Chief Kimball’s FY2010 statement before the House Interior Appropriations Committee stated:

“The National Forest System has a transportation system not suited for its modern needs and requires realignment to “right-size” its system for the future.” May 12, 2009.

Indeed, current allocated funding prioritizes “right-sizing” our roads network, over maintaining our existing one. If a timber sale is simultaneously opening roads that are currently decommissioned, ensuring future access to areas for treatment, and justifying road repair as part of a mitigation argument for short term impacts to water quality and forest health than it is not achieving restoration priorities. Additionally, if this work is going to occur outside of the forestwide planning efforts and be proposed as a “goods for services” project than it must go through a stewardship, collaborative group.

By including aggressive decommissioning work in with a timber sale, certain LRMP standards are met because of the beneficial effects of restoration mitigating the detrimental impacts of logging. Although we appreciate the ongoing efforts by the

Forest Service to reduce the miles of roads in Mt. Hood National Forest, we question coupling this important work with a timber sale. It is important that we understand the answers to the following questions:

- Is this restoration work that has been prioritized through the forestwide restoration planning process?
- Why is it coupled with this timber sale?
- Will it still be implemented if this timber sale is cancelled or cannot be sold?
- Should a timber operator want to opt out of incurring the cost of the restoration work, would an option to just log be offered to a company?
- Would the Forest Service then put money from the timber sale back into a restoration contract and would that need to be administered through a stewardship group like the Clackamas Stewardship Partners in the Clackamas District?

In the Financial Analysis, the PA states, “The project is a restoration thinning with road repair and decommissioning and as such is not intended to generate income.” (pg 104) How does this address the issue of paying for the road repair? By income, does the Forest Service mean “profit?” In addition, the PA predicts that the downturn of the timber market is “likely to be temporary” (pg 105). Evidence of this is not provided in the PA. The estimate of the road work is approximately \$3 million, but without a consideration for the potential value of the timber that would be auctioned, how can the Forest Service be concluding that there is or there is not going to be an income made on this project? Finally, is staff time for layout and NEPA included?

We found that roads are currently recovered in some instances. Despite the conclusions in the PA that temporary reconstruction of these roads would not impact hydrological features in the project area, we remain disappointed that the Forest Service would use any funds to open more roads. The attached photographs are some of the past road beds that may have been proposed for reconstruction.

In addition to roads work, the forestwide aquatic restoration includes in-stream work. If thinning in Riparian Reserves now is intended to speed up the large diameter tree recruitment for future aquatic features such as log jams, how does this purpose fit the need, considering there are efforts being made to bring decadent trees from other places on and off the forest to areas like Lake Branch, where past logging has depleted the resources and slope stability is important. By planning to bring in logs that have been felled elsewhere (such as those along the road to Cloud Cap, left from the Gnarl Ridge mop up) the Forest Service is aiming to achieve short-term aquatic restoration goals. In light of this aquatic restoration, is there truly still a need to speed up the recovery of Riparian Reserve forest ecosystems? Acknowledging the overlap of these planning processes seems appropriate in the Lake Branch Thinning PA.

Bark maintains concerns around slope stability in this project area. On Road 13, the Indian Creek culvert is designed to sustain intensive debris flow. The map provided in the PA shows red X marks along Road 1330 that are not keyed out, but appear to be washouts and road repair sites. The PA discusses using a monitoring plan for adaptive management. (pg 16) However, in the Cumulative Effects analysis, the PA offers a disclaimer; “A catalog and analysis of all past actions would be impractical to compile and unduly costly to obtain.” (pg. 29) While we appreciate that compiling information from the past that encapsulates both natural and human history is very time-consuming and capturing existing condition can give a more accurate cumulative analysis, we still see value in assessing the known historical trends and impacts.

Road washouts are often a result of too few cross-drains and culverts. There is very little information provided about the specifics of the road work and the techniques that should be used to mitigate impacts from logging on steep slopes. It seems that the existing condition has provided realistic source material for analyzing what features can and should be included in road restoration work. If just one section of the roads work is going to cost over a million dollars, identifying and incorporating the lessons learned from past actions in that area would be a valuable addition to the existing assessment and future monitoring questions.

We maintain serious concerns for the impacts to Listed Fish Habitat (LFH) from this timber sale. We appreciate the inclusion of documents from consultation with NOAA fisheries in with the PA, however, we maintain concerns that impacts from thinning units adjacent to LFH will be compacted by the roads work that is being proposed in these same locations. Because the consultation documents are programmatic, we can only assume that site-specific measures will be taken into consideration based on their recommended mitigation measures.

For instance, with regards to the Water Temperature, the PA claims that a 50% canopy closure will ensure enough shade to maintain stream temperature. (pg 45) However, there is significant overlap with Riparian Reserves and the Summer Elk Range, where heavy thinning is proposed. (pg 10)

The No Action consideration of impacts to Fisheries and Water Quality is unacceptable, particularly considering the weight that the PA has placed on existing conditions as the coverage for NEPA requirements of past, present and future conditions. The PA states, “If no action were taken in riparian reserves, riparian stands would maintain their mid-seral structure for many decades not reaching the desired late-successional characteristics as quickly as thinned stands.” (pg 40) However, the project area is in an area of high earthflow and debris runoff is shown to be common. Additionally, this is one of several references to “many decades.” Can the Forest Service predict how many decades? Was modeling done to consider historical presence of landslide events that may natural quicken the recovery rate of this forest?

In the Transportation analysis, the PA states, “Because funding is not available to repair roads...” as a justification for the No Action alternative. (pg 106) This is a misleading statement. There is significant funding available for this kind of work, with the expectation that planning and prioritization goes into which roads should be getting repair attention. Because of the high use that Road 13 provides to people for access to several popular recreation areas, this road would most certainly be considered a high priority road for funding allocation. Indeed, there is not enough funding for *all* the road repair *and* road removal work that is being prioritized, however funding is available. This justification for an action alternative based on a missed restoration opportunity is another example of the conflict of interest when coupling timber sales and restoration work in the same analysis.

With regards to Elk Winter Range, the PA discloses that forage is less important than maintaining thermal coverage with regards to retention of canopy coverage, but then exhaustively discusses the importance of forage. Details on thermal cover are missing. Does the 47% canopy coverage include roads as part of the average? Additionally, the Mt. Hood LRMP states, “Timber harvest units should average 20 acres and 30 acres in size on winter range and summer range, respectively.” (LRMP, Four-72) How is a timber sale in compliance with the intent of this standard when the units are directly adjacent to each other, particularly considering the planning of this project where most units are lined up one after another?

With regards to degrading suitable dispersal habitat for the Northern Spotted Owl, we request that all units be dropped if they are adjacent to known suitable nesting, roosting and foraging habitat. In Bark’s visits to the project area, we observed that the past clearcut logging has, indeed, led to stands lacking in decadent features. Yet, these cuts are largely adjacent to mature forests that are providing potential habitat for this known threatened species. By decreasing this dispersal habitat, predation will increase in an area that has known and historical presence of spotted owl pairs.

On page 93, the Preliminary Assessment states, “Surveys to detect the presence of most fungi species are not considered practical because of the variability in fruiting-body production from year to year.” However, when surveys determined the presence of suitable habitat of fungal Sensitive Species, the determination was found to be “May Impact Individuals or Habitat but is not likely to lead to a trend toward federal listing.” This determination of impact would seem to be reason for conducting field surveys for fungal species.



In addition, while out surveying in the project area, we sited a rare Gnome Plant, *Hemitomes congestum* in Unit 116 (see photo). Does this plant

exist on any federal or state sensitive species?

Who is providing written material, research and data on Climate Change analysis for NEPA from Mt. Hood National Forest? In the list of preparers, there is no mention of a climatologist or specialist who may be provide a more thorough synthesis of information from scientific literature. For instance, the presumption that the use of utilizing tress to create long-lived wood products as a carbon sequestration measure, is not based on reliable ecosystem analysis. Attached is The Wilderness Society's report on this very issue.

Discussion on the removal of old logging roads on page 107 of the PA perpetuates the idea that the Forest Service can afford to continue having access to all parts of the forest for treatment rotations in perpetuity. This is not economically or ecologically viable. If true restoration thinning is to occur as a priority, than landscape-level road decommissioning must be included in planning. If there are areas with past regeneration harvest that cannot be treated with restoration logging at this time, but can be predicted for treatment in the future, than this should be included in the cumulative impacts analysis of past, present and future conditions in the project area.

We incorporate, by reference, Oregon Wild's comments on the Lake Branch Thinning Preliminary Assessment.

Thank you, again, for your consideration of our concerns. Please do not hesitate to contact me with any questions or need for clarification.

Sincerely,

Amy Harwood
Program Director