



**BARK**

PO Box 12065  
Portland, OR 97212  
www.bark-out.org  
503-331-0374

Cindy Enstrom  
Cascades Field Manager  
BLM – Salem District  
1717 Fabry Road SE  
Salem, OR 97036  
Submitted by email to OR\_Salem\_Mail@blm.gov, attn: Cindy Enstrom

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

Dear Ms. Enstrom,

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, comments and suggestions for the proposed Airstrip Timber Sale:

**Project description**

The Airstrip Thinning sale, as proposed, would log 290 acres of natural second growth forest in the Ladee Flat area of the Clackamas River watershed. This project includes construction of 2.2 miles new road and 54 landings, 5.4 miles of road re-construction, 10 acres of logging and ground-based yarding in a Riparian Reserve and 124 acres skyline yarding on steep slopes.

The BLM's intent for the project is to thin all stands to a relative density of 35-40 trees per acre on all units to accelerate growth on retained trees.

**Stand condition**

Throughout the EA, the BLM tells a story about this forest: It is overstocked, or will soon grow into an overstocked condition. *EA at 11*. If these stands are not managed, growth rates decline, the health and vigor of the trees and other vegetation decline and

stands begin to “self-thin.” *Id.* Units 7B, 18A&B are young managed stands with simple structure and limited diversity. *EA at 68.* Failing to thin now will lead to reduced volume yield and value over the planned rotation. *EA at 11.* In the riparian areas, conifer stands are “overstocked,” resulting in simple stand structure and declining growth rates. *EA at 13.* The riparian area in Units 18A & B is lacking in vertical canopy structure in terms of tree regeneration or tall shrubs, with too dense an overstory canopy. *EA at 47.*

The EA tells us that as relative density (RD) increases about 50, competition for light, nutrients, and water begins to reduce growth rate and increases stresses on individual trees and the stand as a whole. *EA at 36.* That forest stands with RD over 65 have higher mortality of suppressed trees and higher susceptibility to insects, disease, etc. *EA at 36.* All Airstrip stands have an RD of 59. *EA at 46.*

However, there is also another story – a story that the forest itself tells us and the EA can’t help but recognize. A story about forest that has naturally recovered from fire and logging. A forest that is spacious, healthy and growing well with no evidence of disease to be found.<sup>1</sup> *EA at 43-6.* A forest that hosts a surprising diversity of plant species identified by Bark volunteers, - over 25 species that Bark identified in scoping comments, as well as *Calypso bulbosa*, *Erythronium oregonum*, and *Corallorhiza* sp. in unit 7B. *Corallorhiza* are holoparasites, and indicate the presence of very healthy soils. Even though these stands have an RD over 50, they are healthy and growing well, with a diverse understory. This story does not corroborate the BLM’s assertion of an overstocked unhealthy forest that needs logging to improve forest health.

Despite the story that the forest tells us, the BLM insists that logging now is needed to create healthier, bigger trees in the future for the contradictory purposes of creating better habitat and getting more timber volume. However, this is also belied by information in the EA. The EA estimates that 20 years after thinning, trees in the stands will only average 1.2 to 1.9 inches larger than they would without the logging.

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<sup>1</sup> Unit 7A: there is no evidence of past logging, stand developed from a series of forest fires in late 1800s. Two major classes of trees: 60 and 90 years, with some trees up to 169 years. Healthy and growing well and no evidence of disease was found. *EA at 43-4.*

Unit 7B: logged in 1920s, fires in 1929 & 39. Forest established in the 1940s. Generally healthy and growing well and no evidence of disease was found. *EA at 45-6.*

Unit 18A & B: Stands became established in 1930s, after logging and fire. Uniform 68 year old Douglas fir stand with some maple and alder. Generally healthy and growing well, evidence of old growth stumps, snags and CWD found through the stand. *EA at 46.*

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EA at 46. This is not an impressive surge of growth, and certainly not one worth the irretrievable environmental impacts associated with the proposed Airstrip project.

### **Snags and Coarse Woody Debris**

Standing dead trees (snags) are important resources for vertebrate and invertebrate species worldwide and to forested ecosystems. They return essential nutrients to the soil and increase soil fertility. In the Douglas-fir and western hemlock forests of the Pacific Northwest, over 100 vertebrate species utilize snags for some part of their life cycle. Approximately 20 percent (34 species) of all bird species in the Pacific Northwest depend on snags for nesting and feeding and the abundance of snag-dependent birds is correlated with the density of suitable snags. (Boleyn, et. al., 2002).

The Airstrip EA acknowledges the scarcity of snags in the project area, and the negative impact this sale will have:

- The watershed lacks large snags and there are few large snags in the project area. p70.
- In unit 7A, snags and down wood are generally lacking and do not meet the minimum NWFP standards. p68
- In unit 7B, there are very few large snags and CWD. p68
- Overall snag habitat in the project area does not currently meet the Resource Management Plan's requirement of 40% population densities for the five woodpecker species. p69<sup>2</sup>
- Within thinning units, approximately 10% of snags larger than 15 inches diameter could be cut or knocked over during logging operations. p73.

In sum, snags are incredibly important for biological diversity, the Airstrip project already doesn't have enough snags to comply with the law, and this project would further reduce those scant numbers.

The EA tries to make the impact from snag loss seem much less significant than it is by speaking in the language of percentages, rather than hard numbers. It states, "[a]pproximately 90% of large diameter trees, snags larger than 15 inches and CWD would be retained in the project area . . .at least 96% of these features would be retained in this contiguous block of BLM land." *EA at 77*. However, Table 11 indicates that Unit 7A has no snags over 15 inches per acre, Unit 7 B has 1.1 snags per acre (but none over 25 inches) and Units 18A & B each have 1.4 snags per acre. *EA at 69*. 96% of 0 to 1.4 snags per acre, which is already below the minimum standards, is not enough! That, coupled with the reality that this project area is an forested oasis in a

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<sup>2</sup> The Resource Management Plan for the Salem BLM directs managers to retain snags at levels sufficient to support species of cavity nesting birds at 40% of potential population levels. This 40% requirement must be met throughout the Matrix with per acre requirements met on areas averaging no larger than 40 acres. RMP at 21.

desert of clear-cuts and managed plantations, means that *every single large snag* has significant environmental significance.

In the context of a scarcity of large snags in the project area, the BLM should be focused on preserving the few snags remaining. However, the BLM is doing just the opposite, by felling the two largest snags in the project area and likely several more.<sup>3</sup> The two 60 inch diameter old growth snags in the ROW for the road in 7B presumably provide the majority of the habitat for cavity nesters in the project area. Removal of



*Bark volunteers between 2 large snags in 7B R.O.W.*

these two snags would have an incredibly significant impact on cavity nesters – including the five known woodpecker species<sup>4</sup> and Bureau Sensitive bats. Despite this significant impact, the BLM dodged analyzing this action, stating that: “[f]elling two old-growth snags for road construction in Unit 7B would reduce the number of large snags in the project vicinity. This would reduce high value habitat for bats, primary excavators, and cavity users in the watershed by an **unknown percentage.**” *EA at 78* (emphasis added).

The EA tries to mitigate this loss by saying that after thinning, the trees will grow faster quicker – leading to larger snags in the future. *EA at 73*. This does not account for the time lag needed for the growth, death and decay necessary for these new snags to serve as functioning habitat for cavity nesters. Neither will the creation of snags as a part of the Airstrip project address the immediate need of snag-dependent species that will lose their only homes as a result of this action. Again, there is a time lag between the creation of snags and their utility as habitat. A study that observed use of created snags found trees killed within the last 10 years had little decay and had neither ant colonies nor adequate nesting roosting cavities. (Boleyn, et. al., 2002).

<sup>3</sup> Bark volunteers identified more large snags that are likely to be felled or damaged as a result of this project (specifically the road building in Unit 7B), including:

– 30 foot tall, 4 ft dbh snag 10 feet from ROW in Unit 7B, P2 17 + 45 that we assume will be felled as a safety precaution.

–5 ft dbh snag right on the side of the ROW at P2 16 + 25.

There is also the very real possibility that other snags in the project area will be felled to comply with OSHA safety standards, decreasing the amount of snags in the project area still further than the EA analyzes.

<sup>4</sup> The hairy woodpecker, red-breasted sapsucker, and pileated woodpecker are present in the project area. Northern flicker and downy woodpecker are found in and around the project area. p70

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In conclusion, further loss of snags in the project area would violate the RMP by reducing snags below the already minimal levels, and the EA violates NEPA by failing to provide an adequate analysis of the impact of the loss of these snags on snag-dependent species in the project area. The Airstrip project, as planned, will have a significant impact on the local snag-dependent species that the BLM has not adequately analyzed or mitigated.

Similarly to snags, coarse woody debris (CWD) is lacking in the Airstrip project area and falls below the RMP's requirements. Hard CWD is lacking in all of the units and soft CWD is lacking in 7B. *EA at 70*. The hard CWD is almost exclusively small diameter that does not meet RMP management direction.<sup>5</sup> *Id.*



*CWD in 7B R.O.W*

Up to 10% of existing CWD would be directly impacted by logging operations. Although trees larger than 36 inches diameter would be left as CWD and provide habitat for dead wood species, again, the EA does not account for the time lag needed for the trees to decay to the point where they provide adequate habitat. *EA at 74*. Bark volunteers observed that of the little CWD in unit 7B, much of it is found in the path of the road and skyline yarding corridors planned in

unit 7B. In a forest that already has too little CWD, activities that adversely impact 10% of the little remaining CWD do not comply with the RMP.

### **Special Status Species**

For Oregon and Washington BLM administered lands, Special Status Species policy details the need to conserve listed species and the ecosystems on which they depend. Conservation is defined as the use of all methods and procedures which are necessary to improve the condition of Special Status Species and their habitats to a point where their Special Status recognition is no longer warranted. There are several Special Status species that will be adversely impacted by the proposed Airstrip thin.

### **Oregon Slender Salamander**

When the Salem RMP was created, the Oregon Slender Salamander was included as a Bureau Assessment species. RMP App. B-2-3. The RMP directed the BLM to “protect and manage assessment species and their habitats where possible so as not to elevate

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<sup>5</sup> Minimum of 240 linear feet of logs per acre, reflecting the species mix of the original stand. All logs must be at least 20 inches in diameter and 20 feet in length. RMP at 21.

their status to any higher level of concern.” RMP at 28. Unfortunately, it appears that the BLM did not follow this management direction, because now the Oregon Slender Salamander has been elevated to a Bureau Sensitive species.

As a Sensitive species, the BLM must manage the species and their habitats so as not to contribute to the need to list *and* to recover the species. *RMP at 28* (emphasis added). It appears that, again, the BLM has not taken this management direction seriously, as the Oregon Slender Salamander is present in units 7A & B, if not more locations, in the Airstrip project area. The EA states that there **will be mortality or disruption of up to 10%** of the salamanders in the project area. *EA at 75*.

The EA tries to downplay the loss of this species and their habitat, by stating that “[t]he species would persist where CWD habitat of adequate size and populations currently exist.” *EA at 75*. However, as discussed above, CWD levels in the project area already below that required by the RMP. Thus, to further reduce salamander habitat in an area that already has insufficient CWD does not help to recover this sensitive species and violates the RMP.

### Bats

The EA states that four bat species of concern are suspected to occur in the Airstrip Thinning vicinity, but fails to provide any further information. *EA at 71*. Bark would appreciate additional information about the bats, including answers to the following questions: Have there been surveys done? Where are the bats located? What kind are they? What actions is the BLM doing to protect their habitat? This information is vital to determining what impact the proposed sale will have on the sensitive species.

The EA does concede that “[b]at species which use snags or large trees could be directly affected by loss of up to 10% of large diameter trees in Unit 7A and large snags throughout the project area.” *EA at 76*. However, as discussed above, the loss of the two large snags – and possibly more – in Unit 7B would reduce high value habitat for bats, primary excavators, and cavity users in the watershed by an **unknown percentage**. *EA at 78*. The best the EA can tell us is that project will adversely impact an unknown number of bats in unknown locations by an unknown percentage. This is not an acceptable level of analysis.

Bizarrely, despite the lack of any real analysis, the EA concludes that “[h]abitat for species known to occur in the project area will not be eliminated, habitat connectivity would not be changed, any alteration would have only short-term limited impacts and long-term effects would be beneficial.” *EA at 79*. Really? As the few large snags in the project area are very likely the *only* high quality habitat in and around the project area, when they are felled what will happen to all the snag-dependent species? Similar habitat does not exist in or around the project area – being that it is surrounded by

clearcuts and managed plantations – and it will be an extremely long time before similar habitat is created. Again, the BLM has not adequately analyzed or disclosed the actual impacts of this project on sensitive species.

### **Survey & Manage Species: Oregon Megomphix**

The EA was limited in its discussion of the management strategy it will use to protect the Oregon Megomphix found in Unit 7A. Upon reading the Management Document, I'm assuming that the BLM will employ Management Strategy 2 to create buffers for this population in the project area. Please confirm.

One of the major influencing habitat factors for O. Megomphix is shade. Shade helps to moderate fluctuations in temperature and humidity. Management activities in the habitat area should result in crown cover sufficient to provide shade over most of the area at the completion of the project. MANAGEMENT RECOMMENDATIONS FOR TERRESTRIAL MOLLUSK SPECIES *Megomphix hemphilli*, the Oregon Megomphix Version 2.0 by John S. Applegarth.

Strategy 2 directs the BLM to designate “hot spots” within the action area as buffers for the O. Megomphix and to maintain some connectivity within the management polygon and between “hot spots. *Id.* It is recommended that at least one “hot spot” be identified per 10 acres, averaged for the Habitat Area. The “hot spots” can be relatively small (generally 1 - 2 acres in size) and should make up 10-20% (or more) of the total Habitat Area. Outside of these “hot spots,” but still within the Habitat Area, management may be allowed for other purposes. Please explain how the BLM is determining the “hot spots” and protecting the four known site of O. Megomphix.

Because large old logs are important to the survival and dispersal of O. Megomphix, the management guidelines also direct that the coarse woody debris standard and guideline should be met or exceeded. However, as noted above, the project area does *not* currently meet, let alone exceed, the CWD standards. Please explain how the BLM intends to protect the known locations of the O. Megomphix, as this information is completely lacking in the EA.

There are also known populations of tall bugbane (*cimiciguga elata*) in the southwest corner of unit 7B. Tall bugbane is a candidate species for protection by the state of Oregon. The population of this species is believed to be low or declining and the habitat is sufficiently threatened and declining in quantity and quality. Please explain how the BLM is going to protect this sensitive species.

### **Soils**

The EA acknowledges that there will be direct impacts to soil productivity in the project area from the proposed action due to increase soil compaction and erosion. Soil conditions strongly influence long-term forest productivity, the composition and condition of vegetation, rates of vegetative recovery after disturbance, sediment flux,

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and the quantity, timing, and quality of water produced by watersheds, which, in turn, affect aquatic populations and habitats (Beschta et al., 2004). Because soil conditions strongly influence future forest vegetation conditions, soils profoundly affect the functionality of forest vegetation with respect to ecosystem processes.

## Compaction

Soil in the project area is described as “susceptible to compaction.” *EA at 65*. Soil compaction and displacement decreases soil fertility and the growth of plants, and may increase runoff and erosion. 90 years ago, this area was logged. Soil compaction from the skid roads is still visible. *EA at 65*. 30 years ago, this area was logged. Soil compaction from the skid roads is still visible. *EA at 65*. With this history, how can we believe the BLM’s assertion that the soil compaction from the Airstrip project will only impact the area for 3-5 years?

Throughout the EA, the BLM talks about how many acres/percentage of the project area will experience soil compaction or displacement. However, in no one place does the EA add these numbers together and analyze at the impacts to soil disturbance across the project area. So Bark did, and found that in the 290 acre project area, up to 43 acres would be disturbed from yarding and landings, and 7 acres from road building.<sup>6</sup> Up to 50 acres (~20%) of the project area may experience soil compaction from the proposed project.

Rather than addressing the short and long-term impacts of decreased soil productivity on 20% of the project area, the BLM ducks the question by repeating that thinned trees grow faster, so all will be well. This completely fails to address the impact of soil compaction across the landscape.

## Erosion

Average surface erosion for forested areas at .007 tons/acre/year.<sup>7</sup> *North Fork Clackamas Watershed Analysis at 2-11*. Roads and logging increase this number significantly. *Id.* Unit 7B has an approximately a 70% slope and is slated to be skyline yarded. The Airstrip EA predicts that erosion rates will increase in the skyline yarding units by 6 tons/year over the area. *EA at 67*. Erosion rates typically last from 3-5 years, resulting in 18-30 tons of sediment loss in the area. *Id.* While recognizing the increased erosion from skyline yarding, the EA fails to analyze the loss of soil from

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<sup>6</sup> Ground-based yarding: surface disturbance and soil compaction to approximately 6-8% (17-23 acres). Skyline yarding: 3-7 % (9-20 acres) compaction. Alt 1 – 6 acres of soil compaction from new road building; alt 2 - 5 acres. Renovating one mile of existing road, 2 acres of additional soil compaction. *EA at 66*.

<sup>7</sup> The EA states that the average annual sediment yield for small forested watersheds in the Pacific NW range from .02-19.43 tons per acre, with a mean of 1.75 tons/acre/year (1984). *EA at 58*. This is far higher than the estimate in the Watershed Analysis.



constructing a road on a 20% slope, or from the construction of 54 landings.<sup>8</sup> Inexplicably, the EA concludes that the cumulative effects the site productivity and erosion would not be detectable on a local scale. *Id.* The EA does not reconcile this conclusion with the loss of up to 30 additional tons of soil from the project area, nor does it analyze the loss of soil in the context of the inevitable erosion from the surrounding private clearcuts.

Also, 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. Logging and skyline yarding on the steep slopes of unit 7B could create conditions for a landslide event. This possibility was not mentioned in the EA, and Bark requests that the BLM analyze the increased risk of landslides because of the Airstrip project.

### **Water quality**

The proposed Airstrip timber sale will impact water quality occur two ways in the project area: 1) road building & decommissioning; 2) erosion from logging project & hauling.

The BLM's proposed road through section 18 is a cause of concern. Bark visited the proposed stream crossing site and saw that while the creek is fairly small, at the proposed crossing it runs through a trough approximately 4 feet deep and 12 feet wide. This unique feature appears to require an enormous amount of fill to bring it level with the rest of the road bed. This fill seems like it will be a significant source of fine sediment to the stream when it is used as a haul route, and it is quite unclear how the BLM intends to stabilize it. However, neither the trough nor fill were mentioned in the EA. Please provide detailed plans for this stream crossing that include a discussion of the fill needed for the trough, how it will be stabilized, and the impacts of this fill on water quality.

The proposed road in Section 18 would be a natural surface road. Will this road be left over the winter? If so, how can the BLM ensure that it will not be a major source of sediment to the small creek? When the crossing is removed, will all the fill from the trough also be removed? If not, isn't it likely that when the stream swells in the winter that all the fill material will enter the stream system? What would this impact be?

The EA stated that turbidity levels at the site of the temporary culvert would be unlikely to exceed water quality standards beyond the mixing zone and would

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<sup>8</sup> The WEPP model indicates that sediment from forest management practices, specifically skyline yarding, could increase sediment by 6 tons/year. *EA at 60.* The model did not include sediment from the landings, hauling, or ground-based yarding, all of which are known to add sediment to the waterways.

decrease as the channel bed stabilizes. *EA at 60*. Bark thinks that as a matter of policy mixing zones are a very bad idea, and enable the violation of water quality standards.<sup>9</sup> The EA also acknowledges that installing and removing a culvert in unit 18A would locally increase turbidity for half mile downstream for short durations of several hours each day over a 2-3 day period. *EA at 61*. Where will the sediment settle? How can the BLM ensure that all the sediment settling in this half-mile section will not impact the streambed habitat?

Regarding the road in 7B, it is on a slope of 20-30%. Bark has major concerns about this road because of its impact on snags in the area, but we are also concerned about it contributing to soil instability and erosion. The EA tries to assure us that the road would be not require extensive cut or fill, so there would be little to no subsurface disturbance and no effect on subsurface or ground water flow. *EA at 59*. Assuming that the slope is 25%, and the road is 15 feet wide, the cut would have to be at least 4 feet deep to make a flat roadbed. Common sense does not allow me to agree with the BLM's conclusion that this deep of a cut would have no impact on subsurface water flow.

The EA does not acknowledge all the landings attached to the road on this steep slope as sediment producers. It is well-documented that landings greatly elevate soil loss in a persistent fashion. The loss of topsoil via erosion irretrievably reduces soil productivity (Beschta et al., 2004; Karr et al., 2004). The EA should have included landings as a potentially significant source of sediment.

In our scoping comments, Bark 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.

The EA asserts that BLM personnel would visually monitor turbidity at stream crossings on haul route during contract administration to ensure compliance with DEQ standards of less than 10% increase in turbidity. *EA at 30*. How often will a BLM timber administrator be on site? In every significant rain event? How many stream crossings will he/she be able to monitor? What will happen if there are visual signs of turbidity? Will the BLM use a turbidity meter or simply look at the stream? Please provide details of your water quality monitoring plan.

Despite the impacts from building roads and landings, yarding and hauling, the BLM again is in denial that this project will have any impact on the environment. The EA

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<sup>9</sup> We believe that it is high time to move past the old adage that the solution to pollution is dilution, and regulate the amount of pollution in a system at the point of entry, not 100 yards downstream.

says that the proposed action is unlikely to alter stream temperatures or sedimentation, would not introduce large amounts of fine organic material into any stream. *EA at 59.* Current conditions and trend in water quality would likely to be maintained under the proposed action. *EA at 61.* These conclusions are not supported by the information included in the EA, nor by the information that the EA omitted to discuss or analyze.

### **Recreation**

LaDee Flat is a popular recreation area, for both authorized and unauthorized uses. The EA recognizes the historical use of this area for unmanaged target shooting that caused safety hazards and contributed to garbage, vandalism, and tree/damage mortality. *EA at 86.* This should not be referred to in the past tense - each time Bark volunteers visited the Airstrip project area, they encountered many people including paintball players, OHV riders (both in and out of the designated OHV use area) and people using the forest for target practice. Although LaDee Flat has been closed to all shooting on USFS and BLM land since 1992, signs announcing that guns are prohibited are all shot up.

The EA states that “all new roads and *some* renovated roads will be closed and stabilized after operations are completed.” *EA at 26-27* (emphasis added). Which roads may not be closed? How can the BLM guarantee that this won't increase the amount of unauthorized use (including illegal shooting, dumping, and OHV use) that is already occurring in and around the project area? Bark is concerned that opening roads in the area will redirect traffic to the old airstrip and increase illegal activity at the site.

Also, the EA says that public use of the proposed harvest units would be restricted for weeks to months during thinning and burning operations. *EA at 88.* Does this mean that the BLM intends to place a closure on the project area? If so, please explain why this is necessary and how the public will still be able to monitor implementation of the project.

### **Invasive Species**

BLM and Bark groundtuthers both identified a high presence of invasive species in the planning area. The EA notes that most were found in disturbed areas, such as road corridors, but English Ivy was found in unit 7A. *EA at 48.*

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, and what measures led to those successes.

The EA contradicts itself by noting both that that “[p]roject would not contribute to the spread of invasive species populations or the introduction of new species” and that “a slight increase in the populations of invasive/non-native plant species present in the project area is likely to occur. *EA at 50 – 51*. The EA also stated that observations in other areas “gives evidence that these species are not strong competitors with native species and that there would not be adverse direct or cumulative impacts.” *EA at 50*. This may be the case for some invasive species but is definitely not true for English Ivy, which is the plague of urban forests around Portland as it out-competes many native groundcover species.

### Cumulative Impacts analysis

One of the most important part of a NEPA analysis is looking at the impacts of the proposed project within the context of past, present and reasonably foreseeable future actions. This “cumulative impacts analysis” provides both the agency and the public a big picture view on how each individual project contributes to the overall degradation or restoration of the environment. NEPA specifically requires the agency to analyze the impacts which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result by collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7.



Clearcut land adjacent to 7A

In *Lands Council v. Powell*, the appellate court remarked that “for the public and agency personnel to adequately evaluate the cumulative effects of past timber harvests, the Final Environmental Impact Statement should have provided adequate data of the time, type, place, and scale of past timber harvests and should have explained in sufficient detail how different project plans and harvest methods affected the environment.” 379 F.3d 738, 745 (9<sup>th</sup> Cir. 2004). Similarly, the Ninth Circuit in

*Klamath-Siskiyou Wildlands Ctr. v. BLM*

observed that a table purporting to examine the cumulative effects of timber harvest was inadequate because “the problem with the entire table is that it does not provide any objective quantification of the impacts” of the past logging. 387 F.3d 989, 994 (9<sup>th</sup> Cir. 2004).<sup>10</sup> The court in *KS Wild* went on to state that regarding future projects, “a calculation of the total number of acres to be harvested in the watershed is a

<sup>10</sup> For full disclosure, I was the lead attorney on this case, against the Medford District of the BLM. Four timber sales, covering approximately 10,000 acres of forest, were halted due to insufficient cumulative impacts analyses.

necessary component of a cumulative effects analysis, but it is not a sufficient description of the actual environmental effects that can be expected from logging those acres.” *Id.* at 995.

Despite the importance of providing a thorough cumulative impacts analysis, almost every NEPA document I’ve ever encountered falls far short of providing one. This is true in the instant case.

The North Fork/Lower Clackamas River Watersheds has been extensively logged and managed and left to illegal OHV use. A rare section of naturally regenerated second growth forest, the Airstrip project area is surrounded by clearcuts and plantations. With such degraded surrounding lands, the ecological importance of the habitat found in the project area is heightened, and the incremental impact of losing this habitat is also greater than may appear if only looking at direct impacts.

The lack of an adequate cumulative impact analysis to assess the loss of snags and CWD, degradation of water quality, impacts to plant and animal species, and soil health is especially problematic given that the area has been highly impacted by past logging, other management, and illegal use activities. Again, simply stating that other activities are occurring or will occur does not suffice as an adequate cumulative impacts analysis.

What the EA does do is summarily describe the lands directly adjacent to the project area: Lands adjacent to section 7 on east north and west, and western half of south line are all recent clearcuts and young plantations. USFS manages section 17 immediately east of 18 and has USFS has 2,557 acres of logging projects planned on these second growth plantations, including No Whisky, No Gin and ReThin. *EA at 42.* The remainder of 18 is private land managed for timber, recreation and a storage area for maintenance supplies. *EA at 39-40.* Most private industrial forest land in this watershed will be intensively managed with regeneration harvests scheduled on commercial economic rotations very 50-60 years. *EA at 35.*

What the EA fails to do is to provide any meaningful analysis of the incremental impact of the Airstrip project on this already denuded landscape. Most cumulative effects sections in the EA conclude that there are no cumulative effects from the project because there are no direct effects. However, as noted above, there are several quantifiable direct impacts from the project, including: increase in soil compaction and erosion, loss of important habitat for bats, woodpeckers, salamanders and other species; and an increase in sediment from logging and road building in riparian area and stream crossing.

To have an adequate cumulative impacts analysis as required by NEPA, the BLM must address the hard questions, like “to what extent would the loss of large snags in the

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project area impact snag-dependent species, in light of the poor habitat conditions surrounding the project area?” And, “with clearcuts abutting unit 7A, is a 10% decrease in Oregon Slender Salamander habitat actually much more significant to the local population than it sounds?” And, “with the upstream subwatersheds severely impacted from logging and roads, will even a small increase in sediment make a big difference?” In the absence of questions such as these (and answers!) the BLM cannot claim to have provided a meaningful cumulative impacts analysis for the Airstrip timber sale.

### **Inadequate range of alternatives**

The Council on Environmental Quality (CEQ), which promulgated the regulations implementing NEPA, characterizes the discussion of alternatives as “the heart of the environmental impact statement.” 40 C.F.R. § 1502.14. The purpose of NEPA’s alternatives requirement is to “sharply defin[e] the issues and provid[e] a clear basis for choice among options by the decisionmaker and the public.” 40 C.F.R. § 1502.14. All reasonable alternatives must receive a “rigorous exploration and objective evaluation..., particularly those that might enhance environmental quality or avoid some or all of the adverse environmental effects.” *Id.* § 1500.8(a)(4).

The Airstrip EA does not provide alternatives that “sharply define the issues” and “provide a clear basis for choice”. No, the two action alternatives are nearly identical, the only difference being the location of one small stretch of non-controversial road.<sup>11</sup> *EA at 22*. This small difference does not present a sufficient choice between unresolved conflicts concerning the use of available resources. Reasonable alternatives to the proposed alternatives do exist, but were not addressed by the BLM. Specifically, the BLM could have identified the very real unresolved conflicts around public lands management raised by Bark in scoping – such as logging in riparian areas & steep slopes and building controversial new roads – and crafted alternatives addressing these. The highly restricted range of alternatives evaluated in Airstrip violates the very purpose of NEPA’s alternative analysis requirement, and must be expanded.

In close, I will note that of the two offered alternatives, Bark prefers Alternative 2, which would renovate part of the existing Airstrip rather than building an entirely new road, as Alt. 2 has slightly less impact on soil erosion and compaction.

### **Conclusion**

While we’ve provided comments about several aspects of the Airstrip timber sale, I want to emphasize that we are particularly concerned about logging on steep slopes

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<sup>11</sup> If the choice between alternate road routes significantly changed the environmental impacts of the project, such as a route that did not log old growth snags and one that did, it may be a reasonable range of alternatives. However, the difference between the alternatives presented - reopening the airstrip and rerouting a road around it - is de minimis and resolves no existing conflicts over resource use.

and the loss of snags & CWD from the constructing the road in unit 7B. The BLM is already in violation of its RMP because of too few snags, and the loss of the two best old growth snags in the project area is a significant impact that simply should not occur. Bark advocates that the BLM end construction of new road where it makes a sharp turn to the east and forego logging the southeast portion of the unit. By not building the remainder of the road, and not logging these steep slopes, the BLM would avoid some of the most significant environmental impacts of the proposed project and not violate the law.

If the BLM persists with its plans as laid out in the EA, be advised that Bark intends to take all steps necessary halt this sale in its entirety.

Thank you for your consideration of these comments. I am happy to answer any clarifying questions and/or discuss these comments further as necessary.

Sincerely,

Brenna Bell, Esq.  
NEPA Coordinator

**Resources cited:**

Beschta, R.L., Rhodes, J.J., Kauffman, J.B., Gresswell, R.E, Minshall, G.W., Karr, J.R, Perry, D.A., Hauer, F.R., and Frissell, C.A., 2004. Postfire Management on Forested Public Lands of the Western USA. *Cons. Bio.*, 18: 957-967.

Boleyn, P., Wold, E., and Byford, K., Created Snag Monitoring on the Willamette National Forest, USDA Forest Service Gen. Tech. Rep. PSW-GTR-181. 2002: 765

Karr, J.R., Rhodes, J.J., Minshall, G.W., Hauer, F.R., Beschta, R.L., Frissell, C.A., and Perry, D.A., 2004. Postfire salvage logging's effects on aquatic ecosystems in the American West. *BioScience*, 54: 1029-1033.