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02/25/2016

Casey Gatz
6780 Highway 35
Mount Hood/Parkdale, OR 97041
RE: Addendum to Polallie Cooper Environmental Assessment Comments

Dear Mr. Gatz,

In the time since we submitted our comments on the Polallie Cooper Environmental Assessment on February 20, 2016 we have found some additional items that we would like to call to your attention.

Roads and logging systems

In our comments on 2/20/16 we stated “Bark is pleased to see the **removal of the new temporary road extending between 4400-624 and 4400-015** in the new Proposed Action, and supports this change being incorporated in the final decision.”

However, we are puzzled as to whether or not the areas that would have been accessed from that road will be logged or left uncut.

The logging systems map (*EA at 34*) shows an area of skyline yarding in the NE part of the project area (Blocks 12 and 14) between the Dog River trail and the Dog River drainage. To the west is an area of helicopter yarding. How will the skyline equipment be moved into the area north and east of the owl circle near the existing end of Road 4400-620 in Blocks 12 and 14? The map of roads that was on display at the public meeting in Hood River does not show any new system or temporary roads into this area. How will the Dog River trail be affected by equipment access and/or road construction in this area? We are concerned that the trail will be impacted; what measures will be taken to protect the trail in this area?

How will a skyline yarder be mobilized into the area between Roads 4400-620 and 4400-015? The map provided at the public meeting does not show a temporary road to provide access. But the map provided by the agency in the spring of 2015 (<http://bark-out.org/sites/default/files/bark->

[docs/Polallie%20Cooper%20proposed%20roads.pdf](#)) shows a temporary road approx.. 0.5 mile long to connect the existing roads.

What will actually be done in Blocks 12 and 14? Will they be logged, and if so, what type(s) of yarding will be used? Or will they be left unlogged?

RECREATION AND VISUALS

After further review of the EA we find there seems to not be a PDC requiring that trails will be rebuilt, and fully restored, in locations where they're damaged by yarding operations. It is likely that the Dog River trail will be damaged by skyline yarding where the corridors cross the trail in Blocks 16, 17, and 19. Please explain what will be done to fully restore the trail and who will be responsible for that work.

Please develop a PDC to address this issue and include it in the final NEPA document for the project.

While I was out cross country skiing this week I did a field test of the proposal to leave a 55 foot wide buffer on both sides of the trails in the project area. My spouse stood at the edge of an old clearcut and I went into the adjacent forest to take photos of her from different angles. I tried to position myself ~ 60 ft. away from her - ie. the width of the proposed trail buffers.

The old clearcut is more open (fewer trees, more light) than areas will be after the heavy thinning that's planned in the Polallie Cooper project but some of the forest that remains adjacent to the buffers will be opened up significantly; that will allow in lots of sunlight. The bright, open areas will be visually evident from the trail – that will draw the viewer's eyes to the logged area outside of the buffer.

While hiking or biking on a trail recreationists will be able to see out to the sunnier area on the other side of the buffer. It will be obvious that the area has been logged. A key factor will be how much screening is left in the understory of the buffer. The fire managers will probably want to remove as many of the small to mid-height trees as they can due to their concern about ladder fuels.

In the process they are likely to remove many of the trees with limbs that serve to screen the view through the buffer. That's another reason why Bark thinks a **100 foot, no cut buffer** is needed; that maintain more screening to protect the recreation experience and retain soil moisture in the forest and trail tread.

If you decide to adopt the proposed 55 ft. wide buffers we would like to know how you will ensure that sufficient understory vegetation is left to screen the view of the logged areas adjacent to the buffer. Will the trail and recreation

specialists work with the fuels and timber staff to develop site-specific buffers so that the recreation experience on Sensitivity Level I and II Trails is not degraded? The people who use the highly popular trails within the project area deserve to have the quality of their recreation experience maintained. If site-specific buffers can be developed for some of the streams in the area then these trails, and the people who use them, (ie. the “recreation resource”) should be given the same attention as listed fish.



Above – I stood in a place where there was almost no screening vegetation in the understory.

Below – My spouse was in the same location but I shifted to a spot where there was some screening vegetation in the understory. The screening makes a BIG difference; the clearcut and my partner are less obvious than in the photo above.



This second set of photos at a different location show a similar result and the importance of retaining screening vegetation in the understory.



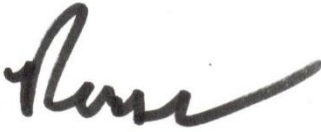
Above – Skier, in red, is visible through the forest



Above – After the photographer moved to a different position the skier is almost hidden by the understory of the forest

This quick field test confirms our view that the proposed 55 foot wide buffers will NOT adequately protect the recreation experience for trail users on trails that have been identified as some of the most heavily used trails in the HRRD. We urge you to include 100 foot wide, no cut buffers – on both sides – of all trails in your final decision for this project.

Thank you,

A handwritten signature in black ink, appearing to read "Russ", with a long, sweeping horizontal stroke extending to the right.

Russ Plaeger
Restoration Coordinator