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April 5, 2013

Dear Whitney,

As you know, Bark works towards a transformation of public lands management on the Mt. Hood National Forest to a place where natural processes prevail, wildlife thrives and local communities have a social, cultural, and economic investment in restoration and preservation. Bark has over 7,000 supporters who use the public land forests of 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 scoping comments on behalf of these supporters.

We are writing today to comment on the proposed Lava Timber Sale. This sale would log nearly 2000 acres within the Middle Fork and East Fork Hood River watersheds. The project proposes to “improve forest health, create better conditions for huckleberry production, maintain a road system that meets transportation needs while reducing aquatic risk, and provides timber for local wood products.” We are concerned that this project will not meet its purpose and need as discussed below.

Though one of the things that complicate the public process is **the timing of the scoping notice**. The release of a document inviting the public to participate in scoping when the area is under snow does not foster site-specific comments. As the scoping period is a time when the public can comment on a proposal and bring up issues before the agency has spent tons of resources on a project, it is in the best interest of all parties to make the process as inclusive as possible. We would strongly urge the agency to live up to the obligation to enable full participation in public lands management by extending the scoping period for the Lava Timber Sale to a more seasonally appropriate length.

This issue is further complicated by the Hood River Ranger District electronic in-box - [comments-pacificnorthwest-mthood-hoodriver@fs.fed.us](mailto:comments-pacificnorthwest-mthood-hoodriver@fs.fed.us) - that was identified in the Lava Restoration Scoping Notice is not functioning properly. We know that a few of our volunteers have submitted comments on this sale prior to the realization of an improperly functioning email address. We do not know if these comments were received, or were lost in the ether. To ensure that all public comments are received and reviewed, we encourage the Forest

Service (FS) to initiate a new 30-day scoping period. The onus is on the FS to enable full participation and initiating a new scoping period would help address that as well as address the lack of access due to snow.

### **1) Huckleberry Enhancement Units**

One of the places we do not need another look on the ground, however, are the Huckleberry units included in the Lava Sale because these are units that we already visited during the Stew Crew field trips last season for the Red Hill Project. As you may recall these are the same units that the group voted unanimously to remove from the Red Hill project because they were situated on the top of the ridge that would be subject to blowdown. As we discussed, if this project is truly to increase huckleberry production, the canopy would have to be reduced to 30% - which would increase windspeed on this exposed ridgeline and worsen the blowdown potential. While we now understand that the Forest Service feels free to ignore the recommendations of the Stew Crew, we still fail to see how the FS can move forward with these units knowing the serious risk of increased blowdown?

On a Forest Service-sponsored field trip, we visited some stands adjacent to the Huckleberry Enhancement units and noted that revegetation was slow to non-existent. These units are located around 4500 feet, on thin mid-elevation soils. If these units are thinned to the recommended 30% and a wind event takes out the rest, this stand will not only be bad for huckleberries, it will be bad for forests. We would encourage analysis of stand recovery adjacent to the huckleberry units in the EA, so that the potential recovery and risk for the proposed units are addressed.

We also noted in the Stew Crew field trip last year that the Lava plantation units already had plenty of huckleberries within them. As the collaborative group then suggested: why can't the Forest Service not look to the plantation stands lower in elevation to enhance already existing stands of huckleberries? It would also be nice to see some serious analysis of what it means to actually increase huckleberry production and not just thin stands where huckleberries are. If the creation of huckleberries is truly the objective, this should take precedent within these stands and not just be an excuse for logging.

The other issue we discussed was that these remote units are not even accessible to the tribes. If that is so, it makes more sense to move the huckleberry units down to a lower elevation stand that is more accessible for huckleberry picking?

These Huckleberry units are on the main road to the popular Vista Ridge trailhead. Logging these units could restrict access to this popular trailhead. Will the project contain any provisions to not restrict recreation access?

Lastly, there were recently two fires in the vicinity – Gnarl Ridge and the Dollar Lake fires. The Stew Crew also recommended the Forest Service look to the

burn to see how the huckleberries are responding and whether there are enhancement opportunities in the burn area. Huckleberries were historically more fruitful along the edge habitat that is more prevalent naturally at higher elevations in parkland ecosystems. The EA should investigate whether this habitat was made more available with the recent fires. As indigenous communities often used fire as the tool for managing huckleberries, it makes sense to start there before try to create something habitat might only exist 'til the canopy closes again. Again, this aspect of the project should actually be about huckleberries and not just a disguise for logging.

2) **This proposal would only decommission 2.1 miles of roads.**

In this heavily roaded planning area, such a low number of decommissioned roads is sad to see especially as the FS has identified there should be a 49% reduction of road miles on Mt Hood overall. Many of the roads in the Lava planning area are in sad shape, and outside of the 1650 road that leads to the Vista Ridge trail, this is not a high use area. This project needs to be much more ambitious with closing unused and unmaintained roads.

The subwatersheds of Tony, Middle Fork, and Bear creek all have road densities well over the 2.5 miles per square mile. Any proposal in the area necessarily must be aggressive with decommissioning roads. Instead, the FS is suggesting to just put up gates restricting 22.3 miles of road, seven of which will only be seasonally closed. We would encourage the agency to reassess the its ability to adequately maintain these 22.3 miles of road and look for more opportunities to actively decommission many more road miles as part of this project.

While we have not been able to see many of the roads on the ground – again the timing of the scoping notice is quite unfortunate – what Bark groundtruthers continually find is that many of the roads that are planned on being put to use are already starting to passively decommission themselves. Thus, after the timber sale goes through the state of the roads actually moves to a more open state than the documents suggest. For example, we see roads that were once filled with alders cut, removed, and the roads resurfaced, brushed and bladed. Essentially, these roads have to start decommissioning themselves all over again. This makes the roads more hydrologically unstable and does not support the purpose and need of “reducing aquatic risk.”

This seems especially relevant as the recent Red Hill Preliminary Analysis (PA) stated that it would decommission 12 miles of road, and works from the assumption that these roads *will* be closed. However, throughout the PA it is clear that roads will only be decommissioned *when and if* funds become

available in the future. As this corresponds with the Forest Service's Incremental Road Decommissioning Process being indefinitely suspended, it does not inspire confidence that the roads will in fact be closed nor the environmental assessment pertaining to roads accurate. We would encourage that all road work be included in the EA so that the public can have the assurance that these road closures are moving forth.

As it is touted as a restoration project, Bark would recommend that increased amounts road decommissioning be central to the Lava project. This is truly one of the most important things that the Forest Service can be doing to restore watersheds, and should not be an afterthought tacked on to logging projects.

### **3) Firewood gathering adjacent to the wilderness.**

The area that the Forest Service proposed to use for firewood gathering is down a very gnarly old road (FSR 1630-660) and will be difficult for the Forest Service to monitor. This has a high potential of folks inadvertently going into the wilderness area to remove trees. The 1630-660 Road also extends well beyond the commercial firewood unit skirting the wilderness area for another ½ mile. What would the agency do to be sure that folks are not taking firewood from the Wilderness area? Would there need to be road improvements made to accommodate the harvest of firewood? What safeguards would be put in place to protect the stream along the southeast corner of the unit? How is the project planned to make sure that "sufficient snags and downed wood would be retained to meet wildlife needs."

### **4) Five-acre clearcuts are unnecessary.**

We are happy to see the FS try and diversify the landscape by putting in disease resistant Western White Pine (WWP) but, as we saw with the Red Hill timber sale the FS is planning on creating 5-acre clear-cuts to facilitate planting (at least this was a reason cited during the Stew Crew meeting). A five-acre gap is hugely unnecessary and is not in line with restoration efforts.

WWP is a fire-dependent species and there was just a lot of fire near the planning area – Gnarl Ridge four years ago and Dollar Lake two years ago. It could be that the trees will move in on their own accord, when the soils have had the time to recover. WWP is also a secondary colonizer in our area – meaning it likes to grow in smaller openings created by disease, windthrow, etc. and not necessarily in large openings. We mention this because it is hard to fathom the necessity of five acre clear-cuts that forward restoration goals in any way.

## 5) **Commercial logging is not restoration.**

“Restoration logging” proposes to better the forest at some future time while the negative consequences are felt today. The Lava Timber Sale is premised on the assumption that thinning grows bigger trees faster and that this outweighs the ecological impacts of increasing soil compaction, sedimentation, and peak flows while decreasing wildlife habitat, down woody debris and snags.

As Bark has mentioned on many occasions, this assumption is neither fully supported in scientific literature, nor applied equally to every stand of trees in the Lava project area. We would strongly encourage the agency to look at the science before assuming every logging project is for the health of the forest. There are innumerable negative attributes to logging - and calling a timber sale “restoration” distorts this fact.

The science and implementation of restoration treatments in young-managed forest landscapes is in its infancy. As recognized by the Pacific Northwest Forest Restoration Learning Network, while retrospective studies and models suggest active restoration is warranted, there are few long-term studies which help managers clearly identify "best management practices" for thinning projects. (Davis, 2008). In fact, a common debate is whether forests should be actively restored (e.g., thinned) and how management of road systems interact with thinning to affect ecosystem recovery at watershed and landscape scales. Moreover, as forest managers begin to implement active restoration in degraded forest landscapes, specific prescriptions for treatments have been extremely diverse. With limited practical experience, managers often are struggling to interpret the scientific literature and develop treatments that are both operationally feasible and consistent with long-term ecological objectives. (Davis, 2008).

In addition, other research on thinning urges forest managers to approach such projects cautiously, acknowledging their uncertainty and ecological tradeoffs. A team of six scientists recently considered large scale thinning and identified many concerns about the practice. They found that even when confined to previously harvested stands, thinning treatments must be evaluated carefully and implemented in such a way as to avoid negative impacts. (Carroll, 2009). Ground based methods, burning of activity fuels, construction and increased use of roads and landings can increase soil erosion, compact soils, and elevate surface runoff. (Carroll, 2009).

They concluded that no evidence exists to support the contention that an extensive thinning program will hasten restoration of historic patterns of forest heterogeneity on a landscape scale. Hence, thinning treatments should

be applied cautiously and only where ecologically warranted. Thinning should not be considered a cure-all for forests degraded by fire exclusion or other human activities. (Carroll, 2009).

Even the Middle Fork Hood River Watershed Analysis (MFHRWA) p. J-6 acknowledges the problem. It mentions that designing timber sales that will move forests to late-seral stands faster is complicated by the fact that snags and downed logs are sorely lacking within the watershed. Commercial logging systems require the felling of many snags and disruption of CWD to remove commercial product from the forest. In an area that is already lacking in snags and CWD, the best way to remedy the situation would be to allow the stand to resume the natural competitive process to create the suppression mortality that will create snags and down logs. This will help provide much needed habitat and build old growth soil horizons, by the decomposition of wood, the erosion barriers created by downed logs across the landscape, and the nitrogen fixing abilities of downed wood.

This is particularly troubling as we see many post-logging environments in the Clackamas Ranger District where Bark volunteers are finding that mychorhizal fungi like chanterelles are not returning to the landscape, some 10 to 15 years post-logging. There have also been recent studies discussing mycoheterotrophs in the landscape. These parasitic plants tap into the mychorhizal relationship of tree and fungi to extract nutrients. They also come into prominence during the stem-exclusion stage of forest development, and don't seem to come back after logging. No one is sure what these ghostly stems do for their environment and we will have a hard time reaching any conclusions if the FS wholesale thins all forests at the stem exclusion stage. These are just a few examples of elements that are lost to the landscape by thinning forests.

Bark requests that the Forest Service engage with these questions and cautions and develop more reasoned and scientifically supported restoration-based alternative for inclusion in the Environmental Assessment.

*A good place to start is Unit 54.* In pre-scoping conversations, Unit 54 was considered a naturally regrown stand, and now the scoping letter has placed it with the regrowing plantations. Unit 54 is much older than other stands and it is questionable as to whether this area was ever fully logged. Only 9% of the Middle Fork Hood River watershed is in late-seral condition, and the Middle Fork Hood River contains the lowest amount of Late Seral forest in all of Mt Hood. (MFHRWA p. J-1). Things aren't much better next door as only 19% of the West Fork is in Late Seral condition (WFHRWA p. 4-29).

While there are a few stumps in the area, this appears to be an old, healthy stand of trees with a pocket of legacy trees within the stand. This unit is moving in the right direction toward developed late successional characteristics. On the Stew Crew field trip, we noticed that the canopy was closing and that tree mortality was commencing. You also mentioned that there was no history of management within the unit. In other words, the forest structure is on its way to progressing uninterruptedly toward old growth, and should be allowed to continue on its natural trajectory, especially in a watershed with so few late-seral stands left and where the science does not support restoration thinning as a way to create old growth forests. Bark recommends that this unit be removed from further consideration.

**6) The cumulative impacts of Lava and the other North Slope sales are significant.**

With 1,700 acres to the west in the Red Hill Timber Sale, unknown thousands of acres directly to the east with Polallie Cooper, and the 2,000 acres of the Lava Timber Sale, these projects need to be addressed as a whole to assess the full effect of all this logging across the north side of the mountain.

These three projects collectively may have an enormous impact on the north side mid-elevation forests on the north slope, and the recent Red Hill PA shows there was no consideration of the big picture when looking at the environmental impact of these Red Hill. Reading through the Watershed Analysis for all the branches of the Hood River, it is clear that there are many existing ecosystem issues on the north side of the mountain. In fact, the WFHRWA p. J-1 notes that the Middle Fork is the most fragmented watershed in all of Mt Hood. Some other examples of issues that need to be addressed on a landscape scale are:

**The potential for Rain-on-snow events increasing peak flows:** The Middle Fork Hood River watershed is highly susceptible to rain-on-snow events, and has experienced a number of debris torrents associated with these events. Just two years ago, two road crossings of the Wets Fork Hood River underwent serious repair because of increased flow and debris. With a number of units concentrated on creeks already in an impaired state, such as Tony and Bear Creek, there area real concerns that these would be exacerbated by logging in these watersheds.

The reduction in canopy allows a greater amount of snow to accrue on the forest floor, while a closed canopy catches much of the snow fall in the canopy and helps it slowly trickle down and be absorbed by the stand. A 50%

reduction in canopy will allow more snow to accumulate on the ground and more rain in to send it down slope. Please include a detailed analysis of the rain-on-snow risk to the planning area.

**Snags are already deficient within the watershed,** and yet this proposal seeks to exempt itself from snag density standards? How can this further restoration goals? Studies show that, “cavity users typically represent 25 to 30% of the terrestrial vertebrate fauna in the forests of the Pacific Northwest.” (Bunnelle et al. 1999). This study goes on to note that a “lack of cavity sites is the most frequently reported threat to “at-risk” species in the Pacific Northwest.”

The WFHRWA notes that the watershed “provides a connection between eastside populations and westside populations of plants and animals.” (5-15). This important wildlife corridor will be heavily impacts because Red Hill, Lava, and Polallie Cooper fill the entire area between the Bull Run Watershed and the Badger Creek Wilderness. The Forest Service *also* exempted the Red Hill Timber Sale from the Forest Plan snag standards – what is the cumulative impact of not meeting these standards across thousands of contiguous acres?

The WFHRWA (5-17) notes that the lack of snags in younger stands may have broken connections throughout the watershed. It discusses how this has affected gene flow between snag-dependent species. This is huge because thinning proposals not only remove many snags because of OSHA safety regulations, but they also remove the trees that would become snags in the near future by capturing mortality through thinning. The scoping notice mentions is that the project will not be maintaining snags at Forest Plan levels, which are: “in sufficient quality and quantity to support over time at least 60% of the maximum biological potential of primary cavity nesters.” There is a corresponding NW Forest Plan standard to maintain snags in sufficient quality and quantity to support over time at least 40% of the maximum biological potential of primary cavity nesters. NWFP Standards & Guidelines, C-42. Please provide accurate numbers of snags per acre throughout the sale area, and the cumulative area of the three planned sales, to determine how great an impact the loss of snags will be on cavity dependent species.

Similarly, the FS seeks to exempt itself from CWD Forest Plan standards. This is a significant issue as many of the affected watersheds are deficient in CWD, and need it both for forest and instream habitat. Like snags, these commercial timber sales harm both the existing CWD because of ground disturbance from heavy machinery, as well as remove trees that are likely to die and contribute



to the CWD on the ground. This simply directly conflict with restoration objectives.

Earlier this year, remote cameras on the NE side of Mt. Hood captured images of nocturnal red foxes, identified as the **Sierra Nevada Red Fox**, long thought to be extinct in the Mt. Hood region. Volunteers from Cascadia Wild were able to get pictures of the critter and have found tracks as well. As the Sierra Nevada Red Fox range down into middle elevations the Lava PA needs to consider the fox and its habitat needs when analyzing these projects.

Another ESA listed species in the planning area is **Bull Trout**. The MFHRWA (3-6) mentions that Bull Trout are present within the Middle Fork Hood River. Any riparian aspects to this project need to fully assess the impact to this species. The Clackamas District is going through enormous efforts to reestablish Bull Trout, not coincidentally because logging activities in the Clackamas District limited habitat. With the cumulative effects of three projects on Hood River, there needs to be a big picture assessment on all threatened fish in the watersheds.

## **7) Best Management Practices**

In recent timber sale analyses, Bark has watched the Forest Service's list of "Best Management Practices" (BMPs) become more and more subjective, with the inclusion of flexible terms like "may", "generally", "should" and "where feasible". This goes against the very purpose of a BMP, and turns them into unenforceable suggested management practices, upon which neither the agency nor the public can rely to assess level of impact. In preparing the Lava project, please only rely on BMPs that have enforceable, quantifiable standards.

Thanks so much for considering these comments. Please let us know if you have any questions regarding any content. Bark will be sure to get volunteers into the planning area as the season allows and will pass along more site-specific information at that time. It is our hope that this future site-specific material will be used to more completely analyze the environmental effects of the proposal and meaningfully include the public in this decision. We encourage the Forest Service to move away from "logging as restoration" and instead focus on decommissioning roads, restoring watersheds, and allowing the forest to recover in a more natural, and less damaging, way.

Thank you,

*/s/Gradey*

Gradey Proctor  
Forest Watch Coordinator, Bark

### References

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