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Dear Jim,

Thank you for the opportunity to comment on the proposed Grove Timber Sale. This project is located in the Oak Grove Fork and Middle Clackamas watersheds and is proposing to log approximately 1,700 acres spanning approximately 30 square miles. Although only 0.2 mile of new temporary roads is proposed to be built, 5 miles of existing road alignments would be reopened for log hauling. The units of logging occur in late-successional reserves (LSR), riparian reserves and matrix forests. The latter also contains allocations within the scenic viewshed designation.

As you know, Bark has more than 10,000 supporters who use the public 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 have also had 15 Bark members spend a total of 17 days exploring the planning area.

This proposed project has brought up our ongoing concern about the Forest Service's assumption that the impacts of commercial thinning are benign enough for massive projects to be proposed annually, overlapping within watersheds and cumulatively covering nearly 10,000 acres of land, without a high level of scrutiny as to the cumulative impacts. Because of the already existing backlog of un-cut timber sales in the Clackamas District, we ask that the Forest Service place a moratorium on planning and implementing new commercial logging sales in the Clackamas District. This seems particularly relevant as the watershed analysis that should be the foundation for this project is outdated and you admitted that it was hastily put together. More, and better, watershed level analysis is needed before more timber sales are planed.

PUBLIC PARTICIPATION

Bark repeatedly has expressed concerns for the ability to have meaningful public input for timber sales of this size and distance across the landscape. In the past five years, the Forest Service has continually grown the size of the proposed projects to now span multiple watersheds and even Ranger Districts in some cases. As an agency that manages public lands and must include the public in all decisions that affect public resources, these sales need to be put forth in a way that included public participation. For the reasons below the Grove timber sale does not satisfy this need to have a meaningfully engaged public.

We heard of the Grove project informally through Forest Service staff and the Clackamas Stewardship since the summer of 2011, however we have only had a

limited map of the proposal to send out to our community in the past 45 days. As mentioned above we were able to get 15 volunteers into the area to explore approximately 20 units, but there is still much of the sale left to explore. Knowing that getting information to the Forest Service early can inform changes to the proposal, we put a high priority on getting to the ground as soon as possible and still could not accomplish a full walk through of the proposal. We would encourage the Forest to accept comments from the public as more of the area is accessible.

Groundtruthing the sale has been hampered by the timing of the release of the scoping notice. Despite our mild winter, the scoping period did not commence until **after** the snow levels dropped in early March, putting the vast majority of the proposal out of reach to the public. As the scoping period is a time in which the public is asked to participate in the NEPA process, the onus is on the Forest Service to ensure that this happens when access to the sale area is possible. When the Forest Service sends out a one-page map covering 30 square miles when 90% of the sale is inaccessible, it is not allowing the public to participate in the public process. We again request the Forest Service only move forth on these proposals when the public can engage in the NEPA process.

Also, we request that the Forest Service make better maps available in the earliest stages of the process. Only after we requested better maps did the Forest Service make them available to Bark – but these should have been available to all the public at the time the scoping notice was released. With the Jazz Timber sale, a project of similar size, the Forest put forth a four-part map so that the planning area was more easily shown in map form. It is especially important to make the information as accessible as possible so that folks going out to visit the area can do so in a safe and effective manner.

Road 4361-130 is closed to the public

We have also found that a large portion of the planning area is closed due to winter range for deer and elk. For example, Forest Roads 4630, 4635, and 4640 are closed for winter range until the end of March. Looking at the maps, there are at least 25 units that are behind these closures. This effectively excludes the public from seeing these units during the majority of the scoping period. Another obstacle found was road 4631-130, which accesses about a dozen units and is closed permanently to the public. This makes it impossible for the public to participate in the process.

Another regular concern from Bark's volunteer groundtruthers is that the units are all unmarked. This makes it very difficult for people lacking such devices as GPS to meaningfully engage with a project that they can't be sure exactly where the unit

starts and stops. For example in Unit 208, a very small unit along road 4640, it is hard to know whether it contained very large Doug Fir (approx. 30" DBH) and Hemlock or were the trees immediately adjacent to it? This is compounded by the fact that the one-page scoping map is inadequate for groundtruthing the sale.

DROP ALL UNITS IN LATE-SUCCESSIONAL RESERVES

The Forest Service routinely justifies logging in LSRs to hasten late successional characteristics. However, the ecological tradeoffs from logging these stands outweigh any assumed benefits. These are past logging units, many surrounded by mature and old growth stands of forest. To impact them, even in the short-term, would not be worth the impact that logging would have on these rare, intact old growth forests in the Oak Grove Fork watershed. These forests are integral to the future success of species like the northern spotted owl and other threatened species.

Historic harvest patterns have fragmented late-successional old growth (LSOG) patches and reduced their ability to contribute to conservation goals. LSOG stands may function as islands of habitat for old forest associated understory species. Effects of thinning on landscape connectivity, spread of invasive species and other processes need to be considered on these remnant LSOG stands. Logging operations increase the edge impacts around the mature forests that are currently providing habitat for the northern spotted owl and create opportunity for species like the barred owls to move in on the territory of the spotted owl, as was witnessed in May of 2011 when a barred owl was spotted directly behind the Ripplebrook store. Dispersal and establishment of some plants may be especially limited among old growth stands because edges of old growth patches may be unsuitable for many plants due to altered microclimate (drying) and increased seed predation. Edge effects have been documented to commonly penetrate 100 m into a forest stand (Chen et al. 1992).

This seems especially relevant as the Oak Grove Watershed Analysis (OGWA) notes that only 53% of the LSR stands are in a late seral condition. *OGWA at 45*. With such a small percentage of forest in LSOG condition we would recommend that no impact is imparted to any of the intact forest in the area. This includes no road building or reopening, in or near LSOG forest, not creating edge habitat along intact forest, not increasing erosion, not allowing passageways for invasives to move into these stands, etc. As the Forest Service moves forward on analyzing this project the agency needs to analyze the cumulative effects to the adjacent LSOG stands as well as the directly impacted forest.

Another detrimental impact of logging in the LSR is the loss of existing snags and snag recruitment. Bark suggests that if the Forest Service must log within the LSR stands that they use a Mature drop and leave (MDL) prescription, which includes thinning conducted in stands where trees are large enough to be of commercial value but are not sold, but left on site. This alternative would reduce the need to build any roads, landings or skid trails to and in the LSRs, and the money saved could balance out the lost income. We would encourage the Forest Service to consider this as an alternative in the environmental analysis.

DISCUSS ALL IMPACTS TO LISTED FISH HABITAT

According to the Oak Grove Watershed Analysis, Winter Steelhead, Coho Salmon, and Spring Chinook are likely using the lower reaches of the Oak Grove Fork. These fish,

which reside along the lower two miles of the Oak Grove Fork below Harriet Dam, are experiencing trouble because of the lack of Fine Woody Debris and gravel creating habitat issues for these fish. We are curious how this project plans to address some of these issues: Will the sale itself create further problems for these streams? Will the road building and reconstruction increase sediment filling in already limited gravel beds? Will invasives establish themselves below units 91-100 right along the Oak Grove Fork? What size will the stream protection buffers be that are placed along streams that feed into these lower reaches of the Oak Fork?

DEER AND ELK HABITAT

Regarding deer and elk habitat we would recommend that the Forest look into the true need of deer and elk before proceeding with this. What monitoring, if any, has the Forest Service done to determine whether or not elk are using the gaps created in recent projects, like the 2007 Thin? What is the demonstrated need to create such gaps? Is there really a limit in forage? Are elk going hungry? Or is there a lack of elk in the ecosystem, and the Forest Service believes more may be recruited with more forage? Are such gaps the best way to provide forage?

One of our biggest concerns with the creation of elk habitat is that it is really a code word for clearcutting. But as studies have shown, biomass of edible browse in clearcuts are often less than that of grass in meadows and is therefore not actively sought out for foraging. (Weckerly 2005). Small clearcuts will only promote the ultimate succession of conifers, not grasses, and, as noted above, are usually avoided by elk for their relatively small biomass availability. Moreover, herbaceous plants existing in clearcuts have been found to be less nutritious to grazing animals because these plants have higher tannin levels, which inhibit the absorption of nutrients and protein. (Happe et al. 1990).

Furthermore, the Oak Grove Watershed already seems to have plenty of opportunities for forage on a landscape scale. In the high meadows along the north end of the project are numerous open meadows along the Cascade Crest like Black Wolf, Cottonwood, Windy, and Big Meadow that make for nice summer range. In lower elevation there are numerous large openings like the large expanse near the abandoned Oak Grove work force and all along the energy corridor between Frog Lake and Lake Harriet.

Please consider these studies in your pursuit of elk habitat:

Happe PJ, Jenkins KJ, Starkey EE, Sharrow SH. 1990. Source Nutritional Quality and Tannin Astringency of Browse in Clear-Cuts and Old-Growth Forests. The Journal of Wildlife Management, 54(4); 557-566.
Jenkins KJ, and Starkey EE. 1991. Food Habits of Roosevelt Elk. Rangelands, 13(6); 261-265.
Long RA, Rachlow JL, Kie JG. 2008. Effects of Season and Scale on Response of Elk and Mule Deer to Habitat Manipulation. Journal of Wildlife Management, 72(5); 1142.
Weckerly FW. 2005. Grass and Supplemental Patch Selection by a Population of Roosevelt Elk. Journal of Mammalogy, 86(3); 630-638.

NORTHERN SPOTTED OWL

In May of 2011 while en route to our monthly Bark About, we spotted a Barred Owl in the forest behind the Ripplebrook Store. We are curious what surveys are being

planned for the area? How might this sale further affect the dynamics between the spotted owl and the barred owl? And how the Forest thinks they can truly asses the situation without any real on the ground data?

For example, the Forest has not surveyed for owls in the Clackamas since 1994 – *over fifteen years ago*. As we saw in the Jazz PA, despite the utter lack of knowledge about how many Northern Spotted Owls are present in the area, and where their nest sites are, the PA makes the claim that the Jazz Timber Sale is Not Likely to Adversely Affect (NLAA) Spotted Owls. In addition to no actual information on the ground, there exists a logical inconsistency between the factual reality that logging will decrease snags, decrease canopy cover, decrease prey, increase competition and predation and increase noise. The Forest Service must analyze each of these variables if we are ever truly going to understand the effect of logging on the spotted owl. Bark encourages the Forest to turn around this trend with the Grove Sale.

One example that speaks to this are the recent studies regarding the northern flying squirrel, the principle prey of the spotted owl. Research has found that squirrel populations in unthinned patches are larger than the thinned, and even those decline after adjacent areas are thinned. (Wilson, T. 2010). Predation seems to be the most limiting factor – thinning seems to open the stands and result in a period of several decades when squirrels are too vulnerable to predation so the population remains very low until new growth reaches 10 meters. Prescriptions that retain visual occlusion in the mid-story layers would be best suited for maintaining squirrel populations. (Wilson, T. 2010). The forest must use the most up-to-date data on the state of the owl today and not base logging on a supposition that twenty years from now conditions will improve because of logging.

UNNECESSARY LOSS OF SNAGS AND THE EFFECT ON WILDLIFE

Dead wood habitat is associated with the presence of approximately one quarter to one third of vertebrate wildlife in Northwest forests. At least 47 species deemed sensitive or special-status have associations with dead wood such as downed logs and snags. (Hagar 2007). At least 20% of birds in the western Oregon Doug-fir forests depend on snags for feeding or nesting (Cline et al. 1980). Pileated woodpeckers play a crucial keystone species role in Oregon's forests, and are directly affected by snag habitat availability. Over two dozen bird species have been shown to use cavities that have been previously excavated by Pileated woodpeckers.

Species which subsequently use pileated-created cavities to nest or roost include bufflehead, which are on sensitive species lists or are considered priority species in Oregon or Washington. On a field visit to the area a pair of bufflehead were found in the unnamed pond just south of Ripplebrook and just east of the Alder Flat trail. We are curious how this sensitive species would be

affected as Unit 178 begins at the top of the ridge above the lake? What surveys will be conducted to determine where this pair of bufflehead will be nesting this season? Or how might logging adjacent to the wetlands affect the habitat for these and other priority species?

Other vertebrate species that need to be surveyed for in the planning area include the northern flying squirrel, which is the primary prey of the northern spotted owl, as well as the common merganser, silver haired bat, fisher, and American marten.

One of the most effective way to determine if these critters will have effective habitat is by monitoring for pileated woodpeckers. This includes: "monitoring to determine if S&Gs are being followed, effectiveness monitoring to determine if they are achieving desired results, and validation monitoring to determine if underlying assumptions are sound." (Aubrey and Raley 2002). Monitoring of 106 randomly selected harvest sites on Forest Service managed land in Oregon since 1996 found that compliance with the snag S&G guidelines was lower than compliance with the guidelines overall, due to a widespread lack of clarity among staff concerning definitions, what snag levels are required to support 40% of the population potential of cavity nesting birds, and the guidelines themselves. (Aubrey and Raley 2002). Monitoring of these guidelines by the Forest Service was inadequate to ensure that pileated woodpeckers and the species that depend on them were adequately protected in thinning projects.

Evidence suggests that thinning lowers snag density relative to un-harvested stands. (Windom and Bate 2008). Windom and Bates (2008) also suggest no-harvest buffers around snags to increase retention rates. Plantation stands contain few large snags, and snag densities are far below historic levels, and have less than half of the desired snag density. Since large snags are required for the habitat requirements of certain species (Cline et al. 2008) but are in short supply due to past and present management the Forest Service should exclude stands with high snag densities from harvest and utilize buffers instead of putting it in OSHA's hands.

Bark requests that stands containing high densities of snags and legacy features, or multiple pockets of snags, be specifically excluded from logging. No-cut buffers should be clearly defined and large enough to guarantee the retention of key snags so as to avoid situations in which they are felled due to safety regulations. In addition, "key" snags should be clearly defined and identified so that adequate communication with contractors can be maintained in regards to retaining these features, and monitoring efforts can accurately ascertain retention rates. Please buffer these legacy features.

Bark is currently engaged in snag-retention monitoring work in relation to the Wildcat timber sale. While several positive interactions and discoveries have come out of this work, it also has raised questions about the Forest Service's ability to adequately implement and monitor snag retention strategies. For example, during our recent monitoring work in the Wildcat timber sale, none of the Forest Service staff we met with were able to guarantee that any snag would be retained, regardless of size, decay class, or habitat importance. Forest Service staff were unable to give a single example of a snag that was clearly defined as a "key" snag during our multiple meetings within the Wildcat sale, even though the FS Wildcat CE letter stated that "[t]o increase the likelihood that snags would be retained, green trees will be marked as leave trees where their live crowns touch certain key snags" (FS 2005). Bark found at least two instances in unit 6 of the Wildcat sale in which legacy snags had adjacent small

diameter (less than 4") "take" trees whose crowns were touching the snags, putting the snags at risk of being knocked down during harvest or taken down due to safety regulations. In addition, it was unclear if skips and gaps had been created within the timber sale, as was outline by the FS planning documents, and no one we talked to at the FS was able to tell us whether or not variable density thinning had been implemented as was intended.

While we were very pleased that the FS was willing and able to address some of our concerns within the Wildcat sale, it seems likely that with an area as large as the Grove timber sale, many more such oversights in relation to special habitat protection and snags will go unnoticed and unprotected. For example, in unit 6 of Wildcat the Forest Service addressed our concerns about an area containing numerous legacy snags surrounded by "take" trees. Forest Service staff contacted the purchaser and arranged to leave most of the previously marked take trees which were interspersed in this legacy snag cluster, and replace them with other volume throughout the sale. While we were impressed and pleased that the Forest Service staff and the purchaser were cooperative and amicable to these suggestions, this area should have been buffered by the Forest Service during the planning process. If oversights like this exist in such a comparatively small sale such as Wildcat, what does that say about a much larger sale such as Grove?

LOGGING IN RIPARIAN AREAS

We are concerned about the large amount of Riparian Reserve logging included in this project. Not only is the Oak Fork watershed very susceptible to landslides, but the Riparian Reserves in these units are recovering quite well. All the streams we have seen were covered in healthy riparian plant species, and most units had a vibrant understory – including western red cedar – growing up. We are concerned that the proposed logging will have a detrimental impact on the riparian areas.

It is strangely not spelled out in the scoping notice the amount of riparian logging that is expected, only that it is to occur and what the objectives might be – primarily to make old growth faster. Though there is very little data on the impacts and benefits of riparian thinning, and what is available is highly ambivalent or indicates net harm to water quality. (Reeves et al. 2006b). This suggests that the risk of inadvertent adverse effects on water quality and aquatic biodiversity from an extensive mechanized thinning program is high. (Rhodes 2007).

In addition to temperature increase, thinning in Riparian Reserves also can lead to increased sediment. The Environmental Analysis for the Collawash Thinning project, admitted that "thinning within riparian reserves is a ground disturbing activity that has the potential to cause a temporary reduction in water quality by allowing sediment to enter the stream channel from surface erosion or run off."

While the Forest Service is quick to put forth all the lofty improvements that logging can do for the forest tomorrow, there needs to be analysis of what the effects are to the forest today. Like, what is the amount of increased sediment that these streams might take in? How much might water temperatures elevate? How will this affect anadromous fish?

This becomes especially relevant since again we found in Unit 210 a long, running stream which is unmarked on the unit map. It starts near the east end of the unit and joins the marked riparian areas on the southwest side of the unit. The riparian areas are evidenced by many vine maples/alders and less conifers. The large, wet area to the south of here is probably an intermittent stream in wetter years as well. We are concerned that since the forest is missing streams in their maps how are we are to ascertain that other streams are not missed?

UNITS ALONG THE SCENIC CORRIDOR

There are numerous units that are proposed directly adjacent to Highway 224. We are curious how these units are going to be logged? How can they be done safely without having to close the highway for periods of time? How will the scenic quality be enhanced or degraded by logging these stands?

EFFECTS TO RECREATION

When reading the extremely brief section in the Jazz PA, there was not an actual examination of the impacts of this project on recreation. A brief mention that "several roads access wilderness trail heads and Bagby Hotsprings" does no justice to how many people actually rely on this area for quiet recreation, nor what an impact hundreds of log trucks and the sounds and sights of heavy machinery – including helicopters – would have. We know that Mt. Hood National Forest has recreation specialists. Please have one write a thorough analysis on the impacts to recreation for the Grove PA.

For example, they could look at Units 112 and unit 144, which are directly adjacent to the Ripplebrook Campground. How does the Forest Service intend to log these areas without them diminishing the natural experience that campers are seeking? Will the campground need to be closed while logging is occurring?

Trail through Unit 88

There are also numerous primitive campsites that would be affected by this proposal too. For example we found a shelter standing in unit 88. There is also a trail that is being used by folks that transects the unit. As the Forest Service is working to privatize the rest of the campgrounds in Mt Hood, which will inevitably lead to higher costs and thus more people looking for cheaper solutions to camping. These primitive sites are likely to be more heavily sought and the environmental analysis should look at the cumulative effects between logging and increased usage. Inversely if logging is occurring on more and more of the landscape due to the increased size and span of these projects are folks having fewer and fewer options to safely camp?

ROAD CLOSURES AND INCREMENT IV

During the latest field trip with the Clackamas Stewardship Group to the Grove Timber Sale, the Forest Service revealed that Increment IV Road Decommissioning, to reduce road density and comply with the Travel Management Plan in the Oak Fork

Watershed, is indefinitely suspended. As Mt Hood National Forest has been a leader in closing unnecessary roads in the Forest, Bark is deeply concerned by this news.

According to the Oak Grove Fork Watershed analysis this watershed contains 228 miles of road, and without Increment IV the Forest would only be closing 5 miles of road in this heavily roaded watershed. This is negligible, and we encourage the Forest to work to further reduce the road mileage in the watershed. Further, isn't one of the stated purposes of this project to generate money for the closing of unnecessary and ecologically impactful roads? How can the Forest deem this project as "restoration" without doing any obvious and noncontroversial road closures?

This becomes especially important when we find conditions on the ground like on Road 242. Road 242 is directly across from Ripplebrook and the road is gated at the start. Approximately100 feet up the road there are 12' Doug Firs inhabiting the roadway. If this is considered an open road, then it makes us wonder how many miles of road there truly are? Then we found Road 4640-015, which does not exist. There is an old landing at 4640-150 that is overgrown with invasives, but the spur itself is contiguous with the forest floor inside the unit. One can't help but wonder when the Forest Service is calling a road "a road" for convenience sake and not when it is actually there? Then, along Road 4640-017 we find a road being taken over by red alders, some as tall as 30' already. There is large DWD blocking the old alignment. Might a road like this be considered closed and allowed to continually passively decommission itself? Especially since we are now in a place where the forest is not going to move forth on decommissioning roads in this heavily roaded landscape? Please include analysis of the road system out there based on the on the ground observations, and not on an outdated database. Please include roads that are becoming naturally decommissioned, those that have already been closed by human designs, and those that seemingly never were in the first place.

One place that would be a good start regarding roads in this project would be to drop unit 158. Unit 158 contains all the new roads in the project area, and they are going to be built on a 15% grade. The steeper these slopes are, the more sediment they are likely to contribute to the surrounding landscape. If you are not going to be aggressively removing destructive roadways from the landscape, at the very least the Forest needs to not be putting more roads on the landscape.

ANALYZE EFFECTS OF PROPOSAL TO THE SPREAD OF INVASIVES

The steel pipeline that runs along 4630 which flows from the Lake Harriet Dam to Frog Lake (pictured below) contains many invasive species including St. John's Wort, thistles, and Scotch Broom. It is also directly south of this corridor that a slim line of units (units 91 – 100) are being proposed. Not only is this area maintained to be a permanent clearcut, and thus likely to continually support these invasive species, but it is directly above these units along a steep slope. And should logging occur south of here it is highly likely that units 91 through 100 would contain pockets of these invasive species.

out Grove Timber Sale

This is a further troubling since Corydalis aqua-gelidae resides along Oak Grove Fork east of the Harriet Dam. Cold-water corydalis (*Corydalis aquae-gelidae*) (Figure 1) is listed as a USFS Survey and Manage species and is a candidate for endangered species listing with the Oregon Department of Agriculture. The species is restricted to western Oregon and Washington forests, primarily in riparian areas adjacent to rivers and streams. Allowing more light into these forests, especially on a southern aspect makes it more likely that we could see some of these invasives set up shop along the Oak Grove Fork. It is well known that flowing water can act as the disturbance regime that these invasive plants have adapted to. And logging these units along a 60% slope directly above the slope will likely cause more erosion and further the spread of invasives further down the slope and closer to the water's edge.

DROP ALL UNITS IN HIGH EARTHFLOW AREAS

According to the Oak Grove Watershed Analysis much of the western portion of the timber sale is within an area with a large ancient landslide. (Quartnary). These weak materials and steep slopes contribute top many landslides. This is also the area where the units are more concentrated. These are the units right around Ripplebrook, up Road 4630, 4631, and 4635.

We have seen some of these areas on the move recently too. For example, Skunk Creek has had a major blowout in the last year. On one groundtruthing outing to the area we hiked well up into the Roaring River Wilderness expansion and noticed just how far up the damage extended. In fact we went about ¼ mile north of 4635 and still could not find the source. And we know that the event extends at least a half mile down to the Road 4630 too. This particular event happened without any land disturbing event. Should logging occur in these areas, new roads, new skid trails, the chances are greater that similar events would occur.

The B8 Earthflow designation under the Mt. Hood National Forest LRMP gives explicit guidance for areas of high earthflow, including: "Ground machine yarding of logs should not occur." (B8-036); "Soil Compaction should not exceed 8%." (B8-40). As the Forest Service has been consistently excluding itself from these standards in every other timber sale in the watershed, Bark is concerned about the lack of monitoring and cumulative impact of so many sales failing to follow Forest Plan standards. Please adhere to these protective standards in the Grove sale.

LACK OF MONITORING AND TRUSTWORTHINESS IN SALE IMPLEMENTATION

The Forest Service recently settled a lawsuit that Bark brought, agreeing to expand protective buffers for streams up to 1000 feet upstream of listed fish habitat. That Bark had to bring this lawsuit to get the result that the Forest Service should have achieved on its own after receiving the 2009 letter from NMFS is part of the disturbing trend of the Forest Service being unaccountable for its timber sales, after the final decision has been made. Bark also sees this in regards to the lack of post-logging monitoring, and any meaningful mechanisms by which the Forest Service can ensure the Best Management Practices ascribed to a sale are actually implemented (see below for more detail on the subject).

With Mt Hood currently going through a lot of turnover, coupled with budget cuts that are not leading to staff getting promptly replaced, we are seeing less and less staff in

the Forest with more and more work to be done. To continually be putting these massive timber sales on top of an overflowing plate is not helping our forests. All this makes us question the assumption that the Forest can adequately monitor the area.

Please include in your PA how the Forest intends to overcome this shortcoming and ensure that these forests are monitored with the care and attention that they deserve.

FOREST NEEDS IMPLEMENTATION PLANS FOR BMPs

Regulations implementing NEPA require that agencies "state whether all practicable means to avoid or minimize environmental harm from the alternative selected has been adopted, and if not, why they were not. A monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation." 40 C.F.R. § 1505.2(c). What we keep seeing is that the Forest assumes that the implementation of BMPs will sufficiently mitigate any problems that the proposed project will have on aquatic systems, but offers no proof of this assertion. A USDA Office of the Inspector General Report concluded that reliance on speculative mitigation measures in order to reach a FONSI significantly compromised environmental quality.

While these are systemic issues throughout the Forest Service, Bark believes that they are also at play in the Mt. Hood National Forest. Failure to transfer information to marking and logging crews results in BMPs not followed and increased environmental harm. Refer back to our discussion of snag retention in the small Wildcat timber sale above – if the Forest Service personnel had such difficulties ensuring that BMPs were implemented on a sale that is less than 100 acres, how can you possibly guarantee they will be followed through the entire Grove project area?

As this sale is almost certainly going to be implemented through a Stewardship Contract, with a Designation by Prescription, it is imperative that the Forest Service create specific monitoring points to ensure that the private company tasked to complete the project thoroughly understands variable density thinning, and complies with every single BMP, and throughout the marking, logging, hauling and completing the project.

CUMULATIVE EFFECTS TO THE OAK GROVE WATERSHED

Several projects in the Oak Grove Fork and Clackamas watersheds have cumulative impacts, which are defined as "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions." 40 C.F.R. § 1508.7. When these impacts are significant, an EIS is required. Id. § 1502.4. Under NEPA, "significance exists if it is reasonable to anticipate cumulatively significant impacts on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts." 40 C.F.R. § 1508.27(b)(7). NEPA also makes clear that "cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement." 40 C.F.R. § 1508.24(a)(2).

As there is likely to be active logging concurrent with this project on part or all of the timber sales covered by the following NEPA decisions: Collawash Thin, No Whiskey, South Fork Thin, Cloak, 2007 Thin, Upper Clack Thin and ReThin, this sale will obviously contribute to a much larger disturbance pattern and needs to be looked at cumulatively. Together these sales impact over 10,000 acres in the Clackamas River Watershed, and need to be looked at in their totality to accurately assess the impacts.

For example, Unit 211 which is very steep, has Mag Creek running through, and is adjacent to a recent Rethin unit. These three variables leave much to be looked at in a cumulative manner. For example how much sediment might enter Mag Creek with two sales along its banks above steep slopes? How might it elevate temperature in the stream?

Many other units of the Grove timber sale are directly adjacent to units of other thinning sales – thus increasing the impact of the sale too. What we have seen historically on cumulative effects analysis is either a mere listing of the projects that are slated to occur in the area or on a resource by resource basis – so the real impacts to all the resources from all the projects is never quantified or discussed. Again, the Forest must do a larger analysis to determine the effects on a larger scale.

Please don't hesitate to contact us with questions or clarification.

Sincerely,

/s/ Gradey Proctor
Forest Watch Coordinator

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