

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

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Ashley Popham, Planner Barlow Ranger District Mt. Hood National Forest 780 NE Court Street Dufur, OR 97021

RE: Grasshopper Timber Sale scoping comments round 2

The information below is meant to supplement the <u>Grasshopper Scoping comments</u> submitted by Bark on 8/14/2019.

4860 FUEL BREAK

In August 2019, Bark surveyed units along the 4860 road¹ where a fuel break is proposed. Mostly over 5,000 feet in elevation, this area included several stands of neverlogged forest dominated by mountain hemlock and silver fir. As we stated in Scoping comments, his subalpine habitat is at extreme risk of being lost due to climate change and should be retained whenever possible. One associate with this type of subalpine forest is the Clark's nutcracker, which depends on high elevation forests for much of its life cycle. Bark volunteers witnessed this bird using the stands proposed for the "fuel break" as part of Grasshopper.

Of stands Bark surveyed along this road, **Units 163 178, 217, 201, 227, 223, 240, & 275** include mature to old forest, never-logged stands containing mountain hemlock as the primary overstory tree, with secondary and understory species including pacific silver fir, lodgepole pine, noble fir, Douglas fir, subalpine fir, and western white pine. Snags and down wood were common in these stands - with a mix of sizes, and a mix of ages/decay classes. All of these stands contained some sign of past fire, and while tree diameters were generally small for the stands' age (but normal for this elevation), there were some larger diameter trees scattered through the units including a 34" DBH mountain hemlock (Unit 227), 32" western white pine (Unit 201), 62" noble fir (Unit 275).

¹ The scoping map shows 4860 road ~100 feet west of actual location at SE corner of Unit 223. Accurate location is shown on Barlow RD map. This creates ambiguity re: unit boundary @ SE corner of 223.



Unit 275 general stand conditions



49 inch DBH silver fir in Unit 275



Unit 178 stand conditions



Unit 201 stand conditions/snag habitat

We are puzzled by the FRCC map produced for this area (including areas of FRCC 3 in some of the highest elevation stands). Our initial assumption given the stands we visited is that this forest type has a long fire return interval – one unlikely overly influenced by fire suppression given the lengthy interval. This cold, moist, high elevation forest would

only burn during extreme fire weather - conditions during which a fuel break would likely be largely ineffective in altering fire behavior and could put wildland firefighters' lives at risk if held as a line of defense.

These hemlock-dominated stands maintained a cool, humid microclimate even into the late summer. Countless campfire rings line the 4860 and spurs, and Bark volunteers noted some previously escaped campfires that were seemingly suppressed relatively quickly or went out naturally, presumably due to these microclimatic conditions.

As we brought up in Scoping comments, the WRWA notes that when fires are pushed by a strong westerly wind even the White River will not provide a significant fuel break because the main method of fire spread is long-range fire spotting. WRWA at 5-34. In proposing fuel breaks, Bark recommends the FS consider topographical conditions in detail, as fuel breaks are largely ineffective unless both weather (in this case extreme fire weather) and site conditions are "right" which cannot be guaranteed. FS should not seek to remove trees and vegetation, build roads, or disturb soils to establish a "fuel break" until these conditions are analyzed.



Unit 178 - small burn at 45°15'35.37"N, 121°32'8.44"W – it was unclear if this fire was human-caused

Adjacent previously clearcut (Units 104, 95, 79)² and previously thinned (Units 62, 63, 65, 66, 272) stands we surveyed had experienced more of a drying effect and are surely

² Unit 79 (a previously logged stand) includes remnant trees up to 48" DBH. Similarly, the 20-year-old clearcut/"salvage" in the location of the Grasshopper burn (Unit 95) contains many standing remnant snags. Where these remnant structures exist in

more exposed to winds. Counter to the stand that was visited by the Wasco County Collaborative this past summer, we observed several nearby previously logged units which contained large numbers of small, young trees including lodgepole pine, creating more hazardous fuel in the longer term. This indicates that a fuel break along the 4860 road could result in these dense stand conditions within a short time in several areas. Areas experiencing harsh winter conditions or frost pockets may only support new growth of lodgepole pine if the canopy is removed over a certain percent. The FS should be careful in any of their prescriptions in this area to include this factor in their silvicultural assumptions about stand response.



Unit 104 dense with lodgepole, presumably not planted there



Unit 95 stand conditions (old Grasshopper burn)

these previously logged stands, they should be retained to carry over biological potential, even if it means placing buffers on them, or placing them within "skips".

Along the 4860, we observed areas of illegal motorcycle use off the open system roads. This activity damages soils, disrupts wildlife, and increases the risk of unwanted, human-caused fire. Given the high probability that fire starts in the area would be human-caused, and the potential for increased access off the main road post-project implementation, the Grasshopper proposed action must include PDCs to reflect this reality.³

The 4860-170⁴ road terminates into a young plantation, where the road contains a fire pit, shotgun shells, and clay pigeons. Keeping this and other spur roads open off the 4860 increases fire risk in this area where the FS is hoping to lessen this type of risk.



Illegal motorcycle activity at 45°15'11.16"N, 121°32'9.17"W (L); and at 45°15'6.63"N, 121°32'1.87"W (R)

There are a few locations where runoff from the 4860 road is approaching acute levels. One such location is at Unit 163 pictured below. The road fill extends into the unit at least 20 feet and continues downslope. An effort should be made at this and other locations to divert water to flatter, more stable areas through use of re-grading, out-sloping, cross-drain culverts/inboard ditch/etc.

³ Some related recommended actions were given in Bark's Scoping comments submitted within the official 30-day comment period.

⁴ There is an error in the USFS roads data. This road runs through unit 15 and 65, not 178.



Road runoff/erosion from FSR 4860 45°15'58.91"N, 121°32'26.00"W

Unit 240 contains significant areas of talus, suitable for populations of pika to persist. We believe that any populations of pika should be monitored closely as they are especially vulnerable to the impacts of climate change and have limited dispersal capacity. It is unclear how pika respond to disturbance from logging operations. The talus areas should be dropped from unit boundaries in a similar way to how it was done in the Waucoma project, to clearly demonstrate the protection of this type of important habitat.



Expansive talus habitat in Unit 240

Bark volunteers noted the presence of *Ramaria* spp. in units 178 and 201. Several *Ramaria* spp. are on the Survey and Manage list. Bark expects that surveys for Survey and Manage species will be completed for all proposed units 80 years and older (however in the case of *Ramaria* spp., 180+ years). We remind the agency that sufficient buffers are required for ALL survey and manage species, and that these buffers must be identified in sale and NEPA documentation. The scoping letter did not indicate how the FS will manage the located species. We request that the agency make this disclosure in forthcoming NEPA documents.







While *Ramaria* likely more prevalent in the area of the proposed fuel break than noted by Bark volunteers, some areas of concentrated individuals include **45°15'48.17"N**, **121°32'13.54"W**; and **45°15'46.93"N**, **121°32'8.91"W**; and **45°15'53.63"N**, **121°32'20.11"W**.



Hericium fungus found along the 4860 adjacent to stands mentioned above

Stands along the 4860 were found by Bark volunteers to contain individuals of *Hericium* fungus, which is the subject of current medical research due to its ability to fight tumors and stimulate the growth of brain cells, potentially fighting against Alzheimer's disease. <u>More information here.</u> Although not required by law, we recommend that if trees containing this species are found during fall fungus surveys, that their locations be documented and marked as leave trees, due to *Hericium*'s emerging medicinal properties.

We request that the FS to take extra care to uphold the following standards and guidelines for the A5 Unroaded Recreation LRMP land allocation that the units previously discussed are within:

• **A5-014** "All management activities within the Management Area shall meet the visual quality objective VQO of Retention in the foreground middle ground and background distance as secn from trails high recreational use areas and water bodies within A5 boundaries"

- Timber Management A5-018 thru A5-022
- Transportation Systems/Facilities; Travel and Access Management: A5-031; A5-032, A5-033, and A5-037;

Lastly, we remind the FS to demonstrate any proposed action within the areas mentioned above's accordance with the **Late Successional Reserve** that encompasses it, **Critical Habitat designation for the northern spotted owl**, and the **Mt. Hood National Recreation Area**.

100-ACRE LATE SUCCESSIONAL RESERVE UNITS

Bark volunteers surveyed LSR units in the central part of the timber sale, including areas off the 4810-220 road network. Most of these units we surveyed are never-logged, healthy forest providing habitat for late successional species. One group found a Douglas fir in Unit 192 that was too big to measure with a forester's DBH tape. Logging these forests is at odds with the Northwest Forest Plan, while also conflicting with the northern spotted owl Recovery Plan. We believe these LSRs provide currently suitable spotted owl habitat in an area that is already deemed as "Critical Habitat" for the species by the U.S. Fish and Wildlife Service.

Late-Successional Reserves are to be managed to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth reacted species, including the northern spotted owl. *NWFP Standards & Guidelines, C-11.* Thinning and other silvicultural treatment inside reserves are subject to review by the Regional Ecosystem Office to ensure that the treatments are beneficial to the creation of late-successional forest conditions. NWFP Standards & Guidelines, C-13. Did the FS consult with the Regional Ecosystem Office in preparing this project? If so, please include the REO's statements about the LSR logging in the PA.

Unit 203: mature forest with areas of old growth (mostly downslope closer to the tributary to Threemile creek), no visible history of logging. Overstory of mature Douglas fir and Ponderosa Pine. Example of large diameter Doug fir: 72.3" DBH. Example of large diameter Ponderosa pine: 49.5" DBH. Snags and down wood were common with a mix of size, age, and decay class. Wildlife or evidence of wildlife observed within the unit: Douglas squirrel, gray squirrel, bear, deer, rabbit, western nuthatch, brown creeper, pileated woodpecker, Steller's jay, pacific wren, American robin, *Dicamptodon spp.* salamander.

Unit 192: The northern 2/3 of this unit is never logged, mature forest containing the largest Douglas fir we found in the project area: 82" DBH. Other large diameter trees in the unit include: 67.5" DBH Dougas fir, and 71" DBH Douglas fir.

Unit 208: Mature forest with areas of old growth, with no visible history of logging. Overstory of mature Douglas fir and Ponderosa pine, with a grand fir understory. Snags and down wood were common with a mix of size, age, and decay class. Large diameter trees include 46" DBH Doug fir, 47" DBH Ponderosa pine, and 34" DBH Western white pine.

Unit 214: Mature forest with a minimal history of logging (scattered older stumps). Overstory of Douglas fir and Ponderosa pine, with a western hemlock understory. Large diameter trees include 52.5" DBH Ponderosa Pine. Snags and down wood were common with a mix of size, age, and decay class.

Unit 193: Mature forest with a minimal history of logging (scattered older stumps). Overstory of Douglas fir and Western white pine (mature, 20-30" DBH on average), with a western hemlock and western redcedar understory. Large diameter trees include 61" DBH Douglas fir. Snags and down wood were common with a mix of size, age, and decay class. Most of this unit is also within Riparian Reserve, making any active management doubly important to justify.

Unit 170: Mature forest with sign of past fire, very few stumps were the only sign of past logging. Douglas fir and Ponderosa pine dominated overstory with grand fir, Engelmann spruce, lodgepole pine, pacific silver fir, western white pine, western redcedar, western hemlock, western larch, noble fir, mountain hemlock in understory. Large diameter trees include 73" DBH Doug fir and 50" DBH Ponderosa pine. Snags and down wood were common with a mix of size, age, and decay class.

Unit 198: Appeared to be contiguous in stand structure and age to Units 203 and 193.



Stand conditions in Unit 192 including 82" DBH Douglas fir



Volunteers measuring large diameter Ponderosa pine in Unit 203 (L); Unit 193: Canopy structure with 51" DBH Western white pine (R)



Stand conditions within Unit 170, including diversity of large diameter overstory trees.

The riparian area surrounding Threemile creek tributary between 203 and 208 includes a perennial stream with moist mixed conifer associates: western redcedar, and pacific yew. Other than scattered, very old western redcedar stumps, this riparian area has no visible history of active management and is completely out of bounds for any thinning, given that it is contrary to the ACS to log in functional, late successional riparian areas.

At this tributary, at **45°15'34.97"N, 121°26'58.44"W**, volunteers also located what is likely a *Dicamptodon copei*⁵, a R6 Sensitive Species. This salamander is stream-dwelling and reliant on cool, perennial streams with coarse substrates, often occurring in small streams with high gradients in forested uplands. If this species is indeed present within this tributary, its habitat should be adequately buffered as required by the R6 Sensitive Species program.

⁵ In recent years Char Corkran, local herpetologist, began finding D. copei in streams on the east side of Mt. Hood, but no D. tenebrosus. An intern with the FS has also found copei in Threemile Cr., according to Corkran.



Tributary to Threemile creek between units 203/204 (above); Dicamptodon copei presence within stream cobble (below)



There are some areas within the Late Successional Reserve land allocation which are not late successional, but are outside the Purpose and Need proposed with the Grasshopper scoping letter:

• There is a large section of talus in Unit 208 facing north towards the Threemile tributary at **45°15'30.01"N, 121°27'10.63"W**. Because the management of talus is not within the scope of this project, and to protect the unique habitat offered by talus slopes, this area should be dropped from the unit boundary.



Unit 208 large area of talus slope habitat

• In unit 203, there are two areas of open rocky meadow habitat, containing Oregon white oak, which would be impacted by ground-based activity. Since the management of these areas are outside the Purpose and Need of this project, they should be dropped from the unit boundary maps.



Unit 203 meadow at **45°15'29.66"N, 121°27'16.41"W**



Unit 203 opening above rock outcrop at **45°15'36.55"N, 121°27'1.06"W**



Previously thinned unit 274

Units 28, 183, 192, 100, 274, and 88 within the LSRs are previously thinned stands, where additional thinning would necessitate removing mature trees, which is inconsistent with promoting late successional structure and habitat in general.

The NWFP directs that within LSRs, risk-reduction efforts should generally be focused on young stands, activities in older stands may be appropriate if: 1) the proposed management activities will clearly result in greater assurance of long-term maintenance of habitat; 2) the activities are clearly needed to reduce risks; 3) the activities will not prevent the LSR from playing an effective role in the objectives for which they were established. *NWFP Standards & Guidelines, C-13.* As there is a general prohibition on commercial logging in LSRs, it is the burden of the agency to show that the proposed actions are clearly needed, and will not prevent the LSR from providing the habitat for which it was created.

BOULDER CREEK/4880 AREA

Units 56 and 260 are previously clearcut in the 1970s, and sparsely distributed young conifers currently grow among a wet meadow that now encompasses the stand. These units were blooming with wildflowers late into summer. Unit 260 is almost entirely

Riparian Reserve, both units include A5/A6 LRMP land allocations. Deer and elk are clearly using these units. The 4880-015 road is no-existent at the point where it is mapped entering Unit 56. These stands should no longer be managed for timber, and given the sensitive wet soils should be dropped from any logging proposal.

Recommendation: non-commercial thinning at the end of the 4880 road or along the roadside/dry upland parts of these units would not disturb the wet meadows but currently these trees provide some cover for deer and elk using the wet meadows - but wet soil conditions start pretty quick and should be avoided to protect soils and habitat.



Conditions within Unit 56 (above); and Unit 260 (below)





FSR 4880-015

FSR 4880-015 is a high clearance, native surface road with low use. The road is blocked by fallen trees less than halfway to Unit 56. Once the road reaches unit 56 it intersects the wet areas and completely disappears. We recommend closing this road and decommissioning it if possible, as was proposed in the original Increment 3 process. **FSR 4880-014** is a similar situation and we offer the same recommendation there.



FSR 4880-014 entrance from 4880

There is an old, unmapped roadbed directly adjacent to FSR 4880-014, on the same side of the road but headed south. This "ghost" road network should be actively decommissioned as it is not currently on the open system or calculated as a contributor to open road density.



Old roadbed unmapped, adjacent to 4880-014

Bark volunteers noted an elaborate hunting stand in the valley surrounding Boulder Creek, at **45°16'31.07"N, 121°33'50.20"W.** The stand had salt licks and alfalfa spread around beneath it, and was erected in a permanent fashion, which is illegal. Please include removing this hunting stand from this location in a wildlife technician or other Forest Service employee or contractor's work for this upcoming year.



Hunting stand and bait near Boulder Creek

The valley surrounding the meandering Boulder Creek includes several flat, wet areas dominated by alder and willow. This area seemed to have a history of more flooding, increasing the water storage capacity in the headwaters of this drainage. The creek itself had many deep pools being used by numerous amphibians and trout. At **45°16'39.86"N, 121°33'53.93"W** we found an area along both sides of the creek which had sign of old beaver presence. Volunteers found old beaver chew on trees, and an overgrown lodge at the confluence of two tributaries of Boulder Creek. Because of beavers' capacity to increase water storage and improve fish and wildlife

habitat overall, this area should be further explored by the Forest Service for its potential for beaver-related restoration work, including reintroduction.



Old beaver chew and potential habitat along Boulder Creek

Thank you,

/s/ Michael Krochta Forest Watch Coordinator, Bark