



BARK

PO Box 12065
Portland, OR 97212

www.bark-out.org
503-331-0374

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Cindy Enstrom, Field Manager
Cascades Resource Area
Bureau of Land Management
1717 Fabry Road S
Salem, OR 97306
[OR Salem Mail@blm.gov](mailto:OR_Salem_Mail@blm.gov), cindy_enstrom@blm.gov

RE: Comments on the Environmental Assessment for the Highland Fling Thinning, OR080-08-05, submitted by email

Dear Mrs. Enstrom,

Thank you for the opportunity to comment on the Highland Fling Timber Sale Environmental Assessment (EA). This project will log approximately 760 acres of forest in Matrix or Riparian Reserve land allocations. This includes several new road construction and/or reconstruction miles, as well as logging in older forests and over areas currently being used for recreation.

Bark has nearly 5,000 members 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 use of downstream water for recreation.

In the past ten years of monitoring public lands Bark has put a high regard for public input on public lands. Although, we strongly support the Bureau of Land Management and other federal land managers' need to consider these forests in a broader regional and national perspective, we also see that this aerial planning view must be matched with insightful, on-the-ground information about the health of the individual ecosystems and the real value of these public lands as they exist for the public good.

A few weeks ago, an adjacent landowner, Laura Bartko shared with me that she was more hesitant to bring her young son into the BLM forests near her home for concern that he might become too attached to the forests before they were logged as part of the Highland Fling project. This statement has had a profound impact on me. When I first

started visiting the area to find out what the BLM was proposing, I met Laura's family and walked through Section 1 with her husband Jim. Their connection to the places around their home is deep and exemplary of the kind of stewardship that we need on public land. **To hear that stewardship from the surrounding community has been threatened is a failure on the part of the BLM.**

We ask that the Salem District of the BLM take into account the human resources that exist in this area as a part of the No Action alternative. The community enforcement that has occurred as a result of the trail network and regular visits has led to a rare view of the potential for agency recreation and enforcement funds to be matched by caring nearby residents. Should this action take place and thinning to occur, many of the surrounding landowners would no longer desire to use the forest and the dumping wasteland that we have seen on other BLM holdings will begin to stake claim.

On April 16, 2010, BLM staff Cindy Enstrom, Rudy Heftner and Keith Walton met up with some community members and myself in the proposed Highland Fling Thinning, Section 35. We were appreciative of this effort. Due to the quick scheduling turnaround we were not able to get the word out in advance enough for other community members to join us. My sincere hope is that the BLM was able to see a glimpse of this meaningful connection to the forests. We would like to incorporate by reference all comments received by nearby landowners, as well as Oregon Wild.

Additionally, we continue to have concerns and questions about this project. Please consider the following in your forthcoming decision.

RECREATION IS IMPORTANT TO THE SURROUNDING COMMUNITY

The Highland Fling project is proposed to occur within Clackamas County, which has one of the highest population of horses in the United States. Equestrian communities have a long history of not only using federal public lands for horseback riding, but also offer reliable and integral support to maintaining trail systems. Several of the areas proposed for logging in the Highland Fling area, particularly Section 1, have been used by horse riders for many years and they continue to uphold a stewardship ethic.

Additionally, many of the residents in the area use the forests for solace and space to walk or hike through. Bark has been approached by more than a dozen people in the surrounding areas wanting information about how to stop plans to log the forests they are connected to.

The EA pays little attention to this use of the forests. On page 10, it actually states, "There were no unresolved conflicts concerning alternative resources..." It then determines that only a No Action and the Proposed Action will be need to be sufficient for a range of alternatives mandated under the National Environmental Policy Act

(NEPA). This is a gross underestimate of the agency's direction to provide a range of alternatives. In public scoping meetings held by the BLM, landowners brought concerns about the impacts to recreation in the area. Why did the BLM not consider an alternative that would remove units that are currently experiencing high recreational use by the public?

NEW ROADS BRING NEW PROBLEMS

The BLM is proposing 3.9 miles of new road, as well as several miles of reconstruction in order to log just over 700 acres of forest. Bark is strongly opposed to the creation of new roads on public lands. With a legacy of thousands of miles leftover from the heyday of logging, our watersheds cannot sustain additional roads. In particular, all roads adjacent, present in or leading to Riparian Reserves should be dropped from the planning. Road construction is in direct conflict with the goals stated in the Aquatic Conservation Strategy.

In particular, we request that the units in Section 29 that would require use of the road crossing Randall Creek be dropped from the thinning. Impacts to salmon as a result of necessary maintenance on this creek crossing are not acceptable. At this time, consultation has not been completed by the National Marine Fisheries Service or US Fish & Wildlife. However, we expect to see the results of this consultation included as an influence over the Decision.

At our recent field visit, I gave BLM staff a hard copy of the research synthesis from Pacific Rivers Council looking at the connections between road density and impacts to salmon recovery. The studies and research that was conducted represent some of the most current and best available science on the impacts from roads on water quality. We submit this document and would expect to see this research represented in future assessments, especially where new road construction is being proposed. The study can be found here on the internet: <http://pacificrivers.org/science-research/resources-publications/road-density-as-indicator>

We have seen the use of roads for logging projects to encourage renewed use of public lands by destructive off-highway vehicle users. We are unconvinced that the BLM has effective plans in place to prohibit the expansion of this use in these forests. Our experience with nearby national forest lands and the current presence of OHVs in the Highland area has proven that this problem exists and has the potential to grow with a new logging project and new logging roads introduced. This is not adequately addressed in the EA.

CURRENT FOREST STAND & FUTURE CLEARCUTTING

The EA states that 564 acres of the forest are within 41-80 years of age and 65 acres are within 81-93 years. In our groundtruthing, we saw much of the area is in the older end of that 41-80 year old forests. The high number of acres that falls in this age class

gives a false impression of the potential for these forests to attain old growth characteristics in the next fifty years.

Because of the failed attempt at revising the outdated management plans in western Oregon through the Western Oregon Plan Revision (WOPR) process, the Salem District continues to plan timber sales using the guidance of an outdated management plan. By allowing more than fifteen years to pass without a revision, the district is out of compliance with the Federal Land and Policy Management Act. The Highland Fling thinning is a good example of the outdated nature of the guidance in the current management plan. As it was discussed at the field visit, there is no longer public support of timber practices such as regeneration harvest, otherwise known as clearcutting.

The Highland Fling EA states that the project area is “not considered to be ready for regeneration harvest.” (p 35) When we met with the BLM we discussed that these forests would be considered for regeneration harvest in the next 15-20 years. The residents in the area expressed opposition to this planning direction. There is interest and value associated with reprioritizing the use of these forests. We understand that a planning revision may not result in all that Bark believes should be present on public lands, however, we ask that the district begin the process of evaluating the revision of their management plan beginning with this timber sale.

SKYLINE LOGGING IMPACTS SOIL STRUCTURE

We ask that you drop all skyline yarding from the Highland Fling Thinning plans. Section 1 has considerable acres in the Clear Creek area and we ask that these be removed from the project. Skyline yarding leaves additional corridor features that can cause invasive species to spread and cause landslide and erosion events. Additionally, skyline yarding will have considerable impacts on the user-created trails that are being used by the residents and this must be considered in the EA.

By dropping the skyline areas of Section 1 considerable road construction could be removed from the project plans. Why was this not considered as an alternative to the Proposed Action?

ADDITIONAL QUESTIONS:

- Are the remains of a settler cabin in Section 1 registered as historic site? Was the State Historic Preservation Office (SHPO) consulted as to the potential impacts from logging?
- We are encouraged to see the BLM continue to include their carbon emission analysis. What is the current feedback or monitoring in place to gauge the assertions made by the BLM? The analysis given in this EA is nearly identical to

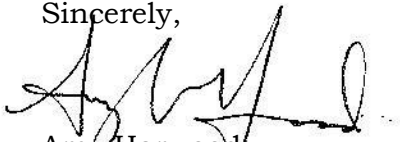
the recent Gordon Creek EA and we wonder how this will continue to be improved upon.

- In our scoping comments, we explicitly asked for comparisons to the nearby Butte Creek project. There was no acknowledgement of this request or plans for monitoring in the EA.

In conclusion, we strongly encourage the BLM to drop Section 1 from the Highland Fling Timber Sale due to the impacts to Clear Creek, the excessive construction of new roads, plans to skyline log and the devastating destruction of a hiking and horseriding trail system cared for by the local residents.

Please consider our other questions and concerns. Do not hesitate to call me for clarification.

Sincerely,



Amy Harwood
Program Director