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Cindy Enstrom
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BLM Salem District
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Dear Cindy,

Thank you for the opportunity to comment on the Highland Fling Timber Sale. 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 deconstruction and/or road closures.

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 over ten years of monitoring activity in the western Cascades, Bark believes the opportunity for active restoration is significant, and we are encouraged to see the Salem District BLM moving in this direction. However, projects like Butte Creek quickly diminish any faith that Bark members have in the agency being dedicated to improving the health of young managed plantations. While it appears that some stands proposed



*Butte Creek – left, February 2006;
right, February 2008*

for treatment in the timber sale are very young, it concerns us that older forests that are displaying late-successional characteristics may also be logged. Just as in Butte Creek, if what little healthy native forest still remains is degraded, then it far outweighs any benefits reaped from the plantation thinning.

Bark's primary concerns as these projects move forward are the role of checkerboard BLM lands in the conservation of wildlife habitat, healthy watersheds, and ecosystem diversity in areas that are defined by private ownership and thus development and industrial timber extraction. Neither of the latter landscapes provide adequate diversity or interior habitat for larger (predators, birds) species nor late-successional habitat for old-growth dependent species. The resulting cumulative impacts of logging these 760 acres in a landscape dominated by private land will be of utmost concern.

As for specific issues Bark will be looking for in the Environmental Assessment:

- 1) ALL riparian areas marked on maps. This should include seasonal riparian features such as ephemeral streams and wetlands less than an acre large. We recommend drafting these maps in mid-winter when these features are most obvious. This provides for good decision-making and allows for accountability.
- 2) Accurate buffers for streams and wetlands. The Forest Service in the Clackamas Ranger District of Mt. Hood National Forest has recently adopted 50ft no-cut buffers for ALL riparian areas. By taking this small step, and by accurately marking stream buffers, the Forest Service has built trust with the public. We request that you adopt these measures too. As for logging in Riparian Reserves we hope that the BLM will take conservative action when proposing these treatments. Course wood placement and in-stream fish habitat improvements are by far the biggest need for fish bearing streams and should take precedence over silvicultural prescriptions.
- 3) Retention of ALL snags.
- 4) No building of new roads and an overall net loss in road density (as measured by open and "closed" road miles).
- 5) A clear description of the Sale-area's range of historic conditions
- 6) Logging be restricted to those stands that have been previously been logged AND planted.
- 7) An impact assessment on the current recreation use of these lands.

Our initial concerns, having spoken to residents in the area, visited parts of the timber sale and viewed the maps are elaborated below. Please take these concerns into consideration through the environmental assessment process.

New road construction and renovation

Bark does not condone an increase in the mileage of roads in our watersheds. New road construction is an unacceptable practice, particularly in riparian areas. Roads lead to an

increase in sedimentation in streams, loss of fish habitat, proliferation of invasive weed species, habitat fragmentation, costly maintenance budgets, as well as many other detrimental impacts to the restoration of healthy ecosystems. What possible restoration gain may come from a commercial thinning project, will be swiftly lost with the introduction of new roads.

Additionally, the road renovation work intended for the Section 1 area (Road 1-4S3E and associated spurs) will be a costly continuation of the problems brought on by a burdensome road system. The four drainage and stream systems currently interrupted by the roadbed feed into Clear Creek. Roads have lasting impacts on the integrity of a forest, but nowhere is the impact as great as in water quality. The Clear and Foster Creek Watershed Analysis (CFWA) states, "...road networks have the potential to affect watershed hydrology by changing the pathways by which water moves through the watershed. Road networks affect flow routing by interception of subsurface flow at the road cutslope (Megahan, 1972; Burroughs et al., 1972; King and Tennyson, 1984; Best et al., 1995) and through a reduction in road-surface infiltration rates resulting in overland flow (Ziemer, 1998). The net result may be that surface runoff is routed more quickly to the stream system if the road drainage network is well-connected with the stream channel network." (CFWA, 132) We recommend that this road be analyzed for total obliteration in the EA.

Decommissioning and "blocking" roads

Bark supports the BLM decommissioning roads in the project proposal. As you may know, Bark has been campaigning around the removal of roads from public lands for the past few years. Last summer, we conducted a large inventory of the roads in Mt. Hood National Forest (~350 road segments covering all four Ranger Districts). Preliminary analysis of the data shows that closing or decommissioning roads with gates, earthen berms, slash, and/or ditches, is only 37% successful. Based on this information, Bark requests that active obliteration of the road bed be the only method proposed for reducing the road system. This includes reestablishing former drainage patterns, stabilizing slopes, removing nonnative species, restoring vegetation, removing the roadbed by restoring natural contours and slopes, removing culverts, reestablishing drainage-ways, removing unstable fills, pulling back road shoulders and scattering slash on any remains of a roadbed. In the forthcoming EA, please elaborate on the work that will take place to remove road beds, culverts and interrupting cutslopes. We expect in the EA an analysis of the current conditions of nonnative plant species. The CFWA states, "Although weeds have invaded many parts of the watershed, large tracts remain weed free. The challenge is to protect the weed free areas from invasion, while reducing the impact to areas where weeds have been established." (CFWA, 262) Roads are one of the most prolific transporters of nonnative plants. By evaluating whether the proposed units are overlapping with these tracts of weed-free forests, the BLM will be able to assess whether building or restoring roads would contradict the watershed analysis recommendations.

Skid trails and Hazard trees from Butte Creek

In a recent hike to the Butte Creek Timber Sale, we witnessed a staggering number of skid trails. As well, we witnessed several trees that had been marked to leave, but were logged due to their proximity to these skid trails. It is our understanding that the contracting timber company determines these skid trails for skyline and ground-based yarding. These skid trails, like roads, have a considerable impact on the forest and the movement of water down the slopes of a forest, especially when large trees are felled because of their placement. In order to adequately analyze the impacts of these actions we request that all skid trails and yarding corridors be determined and included in the environmental assessment.



Butte Creek – tree marked to leave, presumably in the path of a skid trail

Trail System and the Molalla River Alliance

We understand from conversations with residents who live in the Colton, Beavercreek and Estacada area that there are trails winding through these proposed logging areas. Although, these trails are not sanctioned by the BLM, we have learned much from our experience with the Molalla River communities about how important these rare islands of undisturbed forests are to people. Concerns about the impacts to these recreation opportunities were brought to the BLM at a recent public meeting with the Clarkes-Highland Community Planning Organization. Bark anticipates a thorough response to these recreational uses, including user-created trails of the forest in the upcoming EA.

The units in Sections 21, 27 and 29 are within the reaches of the Molalla River watershed. As a result the recently formed Molalla River Alliance has included these lands into the scope of the groups efforts to shift the priority of the Molalla River Recreation Corridor and subwatersheds towards a management of recreation and angler opportunities as top priority. In the recent, initial meeting of the Molalla River Alliance, representatives from a diverse list of organizations (hiking clubs, anglers, environmental groups, including Bark) joined law enforcement and every level of government, including the BLM, together to discuss the challenges and opportunities in this area. There were several positive steps forward towards understanding the scope of the issues. Bark sees the Highland Fling project and the preliminary differences it has raised with local residents, as an unnecessary risk to the trust that will have to be built between the BLM and the residents. Bark understands that it is not usual procedure for the BLM to remove logging units from a proposed action, but in this case we hope that you will make an exception. By removing the units in Sections 21, 27, and 29, from the current proposed action, the Molalla River Alliance will be able to work with the BLM on crafting a

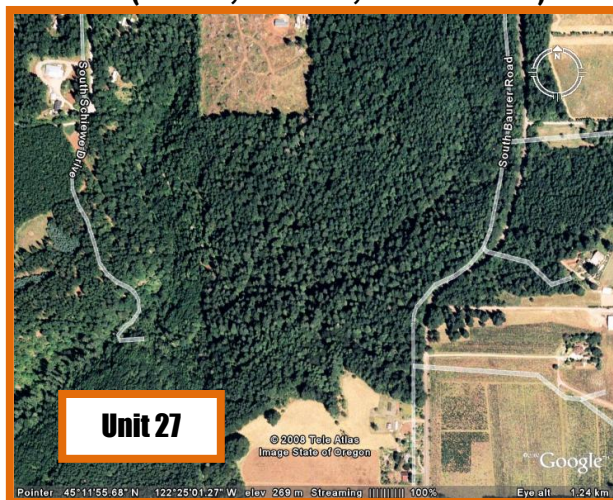
mutually-beneficial vision for the Molalla River Corridor, without the unnecessary tension that a logging proposal may cause.

Cumulative impacts

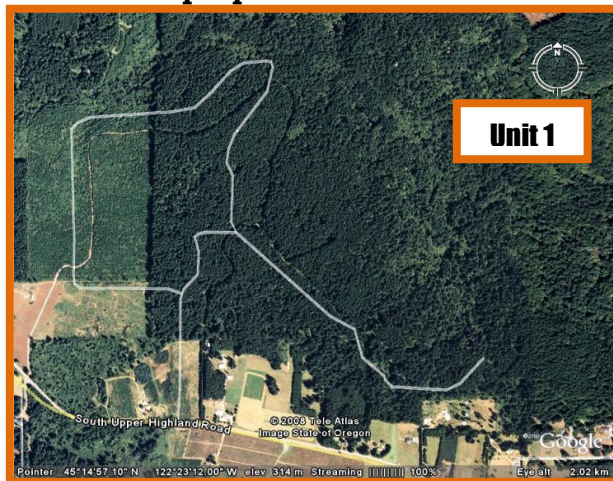
As stated before, we have not been able to visit all of the units of this project. However, this does not preclude us from major concerns regarding the potential cumulative impacts from the logging and agriculture on surrounding private lands.

We have included satellite images to emphasize our concerns about the possible cumulative impacts of this proposal. These images clearly show a few of the units, all of which share at least one boundary with an unforested private holding. For the first image, the proposed unit of logging is almost entirely in a Riparian Reserve and is clearly important to the integrity of Nate Creek, which flows through the unit and feeds into Milk Creek.

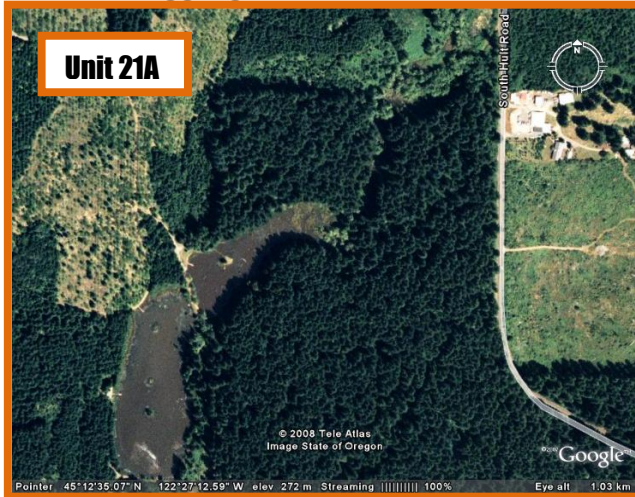
Unit 27 (T.4 S., R. 3 E., Section 27) is almost entirely Riparian Reserve:



Unit 1 (T. 4 S., R. 3 E., Section 1) has four creek crossings and a major road renovation proposal:



Unit 21 and 29 (T. 4 S., R. 3 E., Sections 21 and 29) have considerable Riparian Reserve logging:



Watershed Analysis information

The Northwest Forest Plan states, “Watershed analysis, is required in...Riparian Reserves prior to determining how proposed land management activities meet Aquatic Conservation Strategy objectives.” (NWFP, B-20) The scoping letter explains that units of this project are in the Milk Creek watershed. Although none of the creeks or waterways are titled on the maps provided, we assume that this is in reference to Sections 21, 27 and 29. Bark was unable to locate a watershed analysis for the Milk Creek watershed, nor is it included in any other watershed analysis. Please elaborate on how the proposal is in compliance with the Aquatic Conservation Strategy without this mandated watershed analysis.

Public Involvement

In the future, we request that the agency make a greater effort to inform the public in the scoping process. The scoping letter provides very little information about the nature of the project and the “Frequently Asked Questions” addition does not expand on much. Information about new road building, species of trees, bodies of water and other known information would help the public better understand the intentions of the BLM.

When we requested them, we received more detailed maps of the units included in the proposal. However, as the agency continues to routinely propose projects that span multiple watersheds and large areas, we find it imperative that the BLM provide these maps at the onset of the scoping stage in planning. Understanding that color copies can be cost-prohibitive, we encourage the agency to begin posting electronic copies of these maps on the agency website. As well, we request that these maps include stream names for all major rivers and perennial streams.

In conclusion, we see several considerable concerns with this project moving forward. We encourage the BLM to take a much closer look at how this project will impact the surrounding communities use of the forest, the need for healthy watersheds in an already degraded area and the efforts currently being made to build trust with the public.

Thank you for accepting our comments and we look forward to your response.

Sincerely,

Amy Harwood
Program Director
Bark