



BARK

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Jim Roden
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US Forest Service
595 NW Industrial Way
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RE: Submitted by email to jroden@fs.fed.us, hard copy sent through mail

Dear Jim:

Thank you for the opportunity to comment on the proposed Jazz Timber Sale. This project is located in the Collawash and Hot Springs Fork watersheds and is proposing to log approximately 2,000 acres. Although only 1/3 mile of new temporary roads is proposed to be built, 12 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.

As you know, Bark has nearly 5,000 supporters 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 recreation.

This proposed project has brought up an ongoing concern for the assumption that thinning is 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. We ask that the Forest Service place a moratorium on all commercial logging in the Clackamas District. The location of these projects has seemingly left the Forest Service with little else to log, as they seem to be stacked up against each other with each new project. Whereas some of the forests that originally fell into Late-Successional Reserves were actually much younger than would be expected in an LSR-designated forest, all of the LSR units of the Jazz proposal are adjacent to rare, remaining old growth forests. In addition, the roads that are proposed for use in this project are some of the most impactful to aquatic resources and units are overlapping with the highest designation of earthflow and steepest slopes in the watershed.

We have repeatedly expressed our 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. We first heard of the Jazz Timber Sale informally through Forest Service staff prior to the scoping notice, however have only had a map of the proposal to send out to our community in the past thirty days. Six of our volunteers

were able to go out a total of 12 days of walking the timber sale. Of the 78 units, we were able to make it to most, but definitely not all of the units. 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.

In addition, it was just a year ago that we were out in some of the same area, trying to walk all the units of the Rethin Timber Sale. There was no mention of the Jazz Timber Sale in the cumulative effects analysis of the Rethin Timber Sale, despite several of the units lining up adjacent to one another and the Jazz Timber Sale beginning the NEPA process less than a year after the completion of the Rethin Timber Sale. Under NEPA's cumulative impacts standards, the Forest Service must include the impacts from all past, present and reasonably foreseeable future. The Rethin Timber Sale Environmental Assessment should have considered the Jazz Timber Sale, thus giving the public the knowledge of such increased logging over a short period of time well in advance.

DROP ALL UNITS IN LATE-SUCCESSIONAL RESERVES

The Forest Service routinely justifies logging in LSRs for the potential old growth recruitment. However, these units are not in need of this. They are past logging units that are currently 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 Collawash watershed. These forests are integral to the future success of species like the northern spotted owl and other listed threatened species.

On one recent visit to Unit 4, we saw a great horned owl flying into the unit. This predator of the northern spotted owl utilizes the increased edge habitat for access to prey. Logging operations will increase the definition of the boundaries around the mature forests that are currently providing ideal habitat for the northern spotted owl and create opportunity for species like the horned and barred Owl to move in on the territory of the spotted owl.

One of the most unique features about the units that are being proposed to cut is the diverse understory in many of the plantation stands. In many of the units, particularly those that are in, adjacent to or near to mature stands of native forest, the stands have maintained considerable distance and have facilitated new growth without choking out other plant species. There are Douglas fir and cedar saplings growing amongst Oregon grape, vine maple, rhododendron, willow and red alder.

There are likely many reasons for this unique resilience to a plantation stand and we expect the Forest Service will analyze the natural history of the area. However another unique feature is the higher levels of downed woody debris (DWD). This has likely been consistently replacing nutrients stripped from past logging that has allowed the forest to regenerate more naturally. Additionally, it has provided a variation in the canopy, as well as decadence to the forest floor that is promoting natural processes to enter into an unnatural presence of species homogeny.

DISCUSS ALL IMPACTS TO LISTED FISH HABITAT

The Collawash watershed is a Tier 1 Watershed, indicating it is prime anadromous fish habitat. Many threatened anadromous fish depend on the quality of this watershed for survival. Increases in sediment production over recent years have likely already lowered fish productivity, and contributed to the decline of fish species at risk. Additionally, "turbidity

levels in the Collawash River are consistently higher and persist longer when compared to any other streams in the Clackamas subbasin” (CHSWA, 3-19). This means that any sediment produced during management activities will adversely impact fish habitat longer in this area than it would in otherwise comparable areas.

Winter Steelhead represent “the strongest stock of wild anadromous fish in the watershed” (CHSWA, 3-24). Surveys show that 50% of the run present in the subbasin above Two Rivers used the Collawash watershed as a spawning area. This species is considered a “stock at risk” and any alteration of their habitat (which reaches as close as 0.14 mile downstream of unit tributaries) will greatly impact the viability of the species (CHSWA, 3-24). Late Run Coho, also a “stock at risk,” are found in the watershed. In fact, this population is “probably the last wild population of coho found in the entire Columbia River Basin. Late Run Coho is on the Region 6 Sensitive Species List and “one of the three classes of this stock is very weak and has a high potential for extinction” (CHSWA, 3-24). The Environmental Analysis for the Collawash Thinning project, also in this watershed, 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.” This information combined with the fact that turbidity levels in Collawash are higher and persist longer than those of surrounding streams complicates an effects determination. If management activities “may affect” threatened fish populations, what will be the possible effects?

DROP ALL UNITS IN HIGH EARTHFLOW AREAS

Undoubtedly, some of our biggest concerns with this project lead back to the reality that the units are being proposed in some of the highest levels of earthflow in the Mt. Hood National Forest. The LRMP states the B8 Earthflow designation under the Mt. Hood National Forest LRMP gives explicit guidance for areas of high earthflow. Such guidance includes, but is not limited to:

- “Deer and elk winter range habitat values shall be maintained within two B8 Earthflows on the Clackamas Ranger District...” One of these areas is the Slide, Sluice and Cap Creek area. (B8-012)
- “Open road density between December 1 and April 1 shall not exceed 1.5 miles of road per square mile.” (B8-021)
- “Ground machine yarding of logs should not occur.” (B8-036)
- “Roads and associated facilities shall be designed, located, constructed and maintained to not reactivate or accelerate earthflows.” (B8-048)

SELECTED SITE-SPECIFIC COMMENTS:

Road 6311 is a crumbling, sagging source for everything that roads present as impacts to the ecosystem. Aside from the sixteen units of the Jazz Timber Sale that are along Road 6311, there are five units of the Rethin Timber Sale. The road has deteriorated in the past few years, despite work that was done to facilitate the logging of units for the Bonanza Timber Sale in the past five years. Continuous use and high levels of earthflow has left this road bent and twisted over the landscape and facilitating serious hydrological impacts, as well as an unsafe road to travel on.

The Cap Creek crossing is of particular concern. The road is barely passable in a low-clearance car and the slumping that has occurred around the crossing has severely tilted the road toward the upslope. Water is flowing directly from the road into the creek. For the Forest Service to prepare this road for the upcoming log haul, this road will require serious maintenance. At the least, pit rock will need to fill in where the dipping has become too extreme for use. This rock will have immediate and significant impacts on Cap Creek. Compacted with the surrounding impacts to tributaries of Cap Creek, this waterway will have a high sediment load and road runoff that will adversely affect the fish that are entering less than a mile and a half downstream at the confluence with the Hot Springs Fork of the Collawash River. The Cap Creek culvert is the first fish barrier, due to an improperly placed culvert that has a two foot drop.

Forest Service staff mentioned to us before a recent field visit that plans to fill the area in with large grade rock to allow trucks to pass has been included in the proposal. We are not sure how this major gap - it's about a four foot dip that's at least 20 feet wide - can be filled in with rock without washing downstream? We hope that the agency can provide detailed analysis about how this section of road is going to be installed, how the agency plans to ensure that no further damage will be done to Cap Creek, and a costs analysis so the public can see the benefits of doing major roadwork on a road that is set to be decommissioned in the next increment of road decommissioning.

On a day we joined Forest Service staff, we documented the water in Cap Creek leaving the culvert had a brown and green tinge to it as it emerged from the west side of Road 6311. There appears to already be sediment entering the stream from the roadway and associated slumping. We are concerned about the increased amount of sediment to be entering the stream from the roadwork that will need to be done and the logging along the headwaters of Cap Creek in Units 2 and 4.

Also up the road there was a large hole in the road itself. We found the crater itself after leaving Forest Service staff and so were unable to show him the location. But the hole itself is south of Cap Creek on Road 6311. There are signs of slumping here as well, and seemingly some of the water is penetrating the roadway and creating this cavity. We are concerned that this might be the road starting to wash away. Or that this cavity will only deepen, perhaps picking up momentum and blowing out the side of the road.

In Unit 2, we found a wet area with standing water along the west side of the unit that wasn't indicated on any of the maps. There were pools of water in many locations and skunk cabbage and alders all along the west side of the unit. The unit itself is a decent sized hill with about a 25% slope above the eastern and western streams in the unit. At the top of the hill, a 100 feet or so gain in elevation, there were a few chinquapin and rhododendron which according to *Natural Vegetation of Oregon and Washington* by Franklin and Dyrness indicates that this is the driest area in low elevation forests. This seems important to note because it shows that moisture is running off this hill rather quickly and into the drainage(s). Logging this area will only hasten this loss of moisture and add greater sediment and flow to these streams. These streams are also the headwaters for Cap Creek, and as we mentioned above the troubles with Cap Creek's crossing with 6311, we are concerned that this might be exacerbated by logging this unit.

We walked into Unit 4 from the west and first encountered the thin section in the SW corner of the unit. In this particular slice of the unit were many trees that were older than those found throughout the rest of the unit. The trees are likely in the 70 to 80 year old range. There were also a few older snags and many good sized downed logs as well. Directly to the north of the area was a small pond mostly filled in with willow and cattail. And then to the south is a nice stand of old growth. We feel that due to its surroundings and the more mature forests in this area that this section of the unit be removed from further consideration in this proposal. Also both of these units, Unit 2 and Unit 4 are directly adjacent to Bonanza units. We expect to see comprehensive cumulative effects analysis.

Approaching Unit 18, at the headwaters of Slide Creek, we noticed a pair of bufflehead in the pond. We also saw signs of beaver right in the road itself. It appears that the beavers are planning on creating a dam where the stream runs directly over the road. The road was trenched deep along the crossing and we hope the beaver are able to mitigate the damage done and create an effective closure. We also saw a few enormous snags – 4 feet dbh, 30 plus feet in height, and riddled with pileated woodpecker created habitat. Please be sure to buffer these special features to the landscape so that they are not lost due to safety standards.

Perhaps most interesting in Unit 18 was all the braids of the stream throughout the unit. And like what we also saw in Unit 4 many of these small tributaries are surrounded by old stumps. The streams in many areas are so diffuse that they are more meadow then stream. Throughout a lot of the unit these meadows were filled with Cattail, alder, and willow. We would like the agency to provide a historical perspective of the units so we can get a better idea how past logging has affected this landscape. What special precautions can the agency take to not further damage the many streams throughout Unit 18.

Sluice Creek has five units that are along the creek or its tributaries. (Unit 42, 16, 10, 8, and 20). The latter is especially troubling since it is less than a mile from where Sluice Creek leads into the Collawash. It is noted in the *Collawash/Hot Springs Watershed Analysis* that brook, rainbow, and cutthroat trout are present in Sluice Creek. It also mentions that it is a potential stream for steelhead. With so many units along this stream we hope to see substantial analysis of this creek to ensure it remains as habitat for anadromous fish.

With regards to the sediment we saw along Cap Creek and also along Peat Creek, and the major damage to both of these crossings, coupled with the fact we are not able to fully comprehend the cause of the extensive slumping we have seen in many of these creeks, because of the numerous wet areas we have seen in many of these units, and the presence of anadromous fish we strongly encourage the agency to wait until spring when these areas are actively flowing to fully analyze the effects of this proposal through the Environmental Analysis.

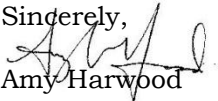
We have accrued many pictures from our groundtruthing of the units proposed for the Jazz Timber Sale. Some of our additional concerns are highlighted in the pictures attached with our comments. There are more photos uploaded and continually being added to on our Flickr site. They can be accessed at this url:

<http://www.flickr.com/photos/barkformthood/sets/72157625033814389/with/5084283361>

We are in the process of working on a set of maps that will not be prepared for today's end to the scoping period, however we will provide them to the Forest Service in the coming weeks and hope that they too will be considered as a part of our ongoing involvement with this project.

We also incorporate by reference anything received by the Forest Service from the Pacific Rivers Council and all individual members of Bark.

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

Sincerely,

Amy Harwood
Program Director

PHOTOS FROM THE JAZZ TIMBER SALE, Scoping 2010



↙ This wetland is indicative of the impacts logging have had on this dynamic landscape. The logging from before allowed the drainage to spread out and has now created a diffused wetland area. Unit 4 is straight ahead in this photo and wraps around to the south (right). We expect there to be an analysis of the natural history of this area that factors the impacts of past logging.



↙ This drainage is one of the many seeps and seasonal streams that we found throughout the units of the proposed sale that were not represented on the maps. Many more riparian areas exist than has been accounted for in these maps, likely because when the maps were surveyed for, the streams didn't exist. Earthflow, past logging, steep slopes and failing roads have changed the course of the waterways several times in the past decades. **How does the Forest Service plan to account for this in their analysis and Riparian Reserve guidance?**



← Unit 36, south end of the unit. Although this forest is a plantation stand and has some of the least diversity of the units we looked at, this still has several decadent features and good spacing between the trees. **How much is there for a commercial timber operator to get from a stand like this?**

1



2



3



4



5



6



7



8



9



10



As the Forest Service knows, Bark has been very committed to ongoing efforts to remove unnecessary roads for the system in Mt. Hood National Forest. We have very strong concerns about the use of the 6311 road system for logging.

1 & 2. We witnessed a sinkhole, considerable sagging, and potential slides in the mainstem 6311.

3. The decommissioning that has happened at the end of the road appears to be effective.

4. However, we did see some signs of ATV tracks going over the berms

5. The road bed of 6311, beyond the decommissioned end of the road has successfully downsloped, beginning to become more aligned with the natural slope.

6. New growth has started to take hold in the decommissioned section of 6311.

7. The culvert for Peat Creek is improperly placed and has created a pooling at the outflow. This pooling will degrade the fill of the road bed.

8. We have seen culverts that are likely going to plug. This is the culvert leading into the wetland.

9. The hairpin on road 6311 that bend around the shore of this wetland is beginning to give out and is presenting unsafe travel and potential impacts to the wetland.

10. The proposed re-opening of old spurs into Unit 26 would force this stream to be put back into a culvert. We wholly oppose this action from happening.



The presence of high earthflow has led to many unique geological and soil features throughout the forest. Several of the streams have many braided outlets throughout the forest that are taking advantage of shifting earth.

We also have found an abundance of mushroom species in unit of the proposed timber sale this season, indicating a healthy soil structure. We expect the Forest Service to be fulfilling all guidance for listed species under Survey and Manage to ensure protection for the rare species that may be present in this area.



Like all of the LSR units that are being proposed, Unit 4 is adjacent to healthy old growth forests. These units have forests that are recovering from past logging and benefitting from the healthy and diverse forests around them. **We strongly urge the Forest Service to drop all units that are in LSR.** These photos show what we believe is the edge of the unit looking into the transition to older, mature forests.





Unit 2 is surrounded on all sides by wetland and streams. **How does the Forest Service expect to avoid impacts into this important drainage into the Cap Creek?**



The level of downed woody debris, here in unit 2, is left from both past logging and natural decay. It has provided a good diversity of biomass structure in the plantation forests.



This image of Unit 2 shows one of the many indicators of high earthflow activity. The tree growing to the right in the picture is likely compensating for the movement of the slope that it is growing in, causing the bend in the trunk at the bottom.



Bark joined with hundreds of thousands of people on October 10, 2010 to acknowledge the causes and effects of climate change by leading a hike to the Jazz Timber Sale. Logging is one of the leading causes of climate change because of the loss to carbon retention that our forests provide. We expect the Forest Service to be incorporating a rigorous analysis into their Environmental Assessment the cumulative effects of ongoing logging. More info at www.350.org.



Stream in Unit 114. This unit is at the confluence of two drainages into the Collawash River. Like the other units with Riparian Reserve in them, this one has several streams not accounted for on the unit map provided to the public.



This wetland and red alder stand is adjacent to Unit 34 and is not accounted for on the map. These alder stands provide stability for shifting earthflow areas, but will not hold up to high levels of windthrow. Should logging occur, we have concerns about the loss of this stand from the increased exposure to wind.



← This mature stand is adjacent to unit 40.

We do not see a need to thin these forests. The impacts that would be caused from roads being reopened, wildlife disturbance and aquatic degradation in a complicated system of riparian areas is not worth the potential speedy recruitment of larger trees and decadent features. The steep slope captured on the left is in Unit 36 and the canopy photograph is from Unit 38. Both of these photographs show a forest that is not in a great need of thinning.

