Comments and/or requests for additional information on the proposed action should be addressed to Jim Roden at:
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RE: Comments on No Whisky Thin Preliminary Assessment

While I support the general plan for this project, there are enough specific failures to cause issue. In particular there was sloppiness in the creation of the No Whisky Preliminary Assessment (PA) and not enough detailed thought about Riparian Reserve enhancements that need to occur along with the variable density thinning. I hope that these comments aid in making this project fulfill its potential.

Roads

- If a subwatershed exceeds the Mt. Hood National Forest Land Resource Management Plan's (LRMP) standards for road density – no new roads should be constructed or reconstructed. There was no analysis provided of the road density in the various subwatersheds. Since the system roads don't take into account the rogue roads, the total road density in this area is even more extreme than is currently being avoided by the lack of reporting.
- The impacts of roads are not limited to travel and use issues. There is ample and copious documentation of the direct physical and ecological effects of road and road building. Examples include their effect on site productivity (Megahan 1988a, 1988b, Douglass and Swift 1977, Robinson and Fisher 1982, Swank and others 1982, Swift 1988), microclimate, hydrologic processes, habitat fragmentation/change (Baker and Knight 2000, Dawson 1991, van der Zande and others 1980), biological invasions (Greenberg and others 1997, Lonsdale and Lane 1994), biodiversity (Forman and Collinge 1996)etc. The discussion of the impact of temporary roads omits all of these issues.

NEPA Issue

- Apparently casual use of "no-cut" and "no-harvest" as synonyms. While similar, they do have differences and it is not clear if there is any intent to differentiate their use.

- "No-cut" and "no-harvest" being used interchangeably in discussions of protective buffers for the mollusk Lyogyrus.
- There are three different lengths of new temporary roads listed (1.5 miles/7755', 1.2 miles/6225', and 2800'. Errrrr….
- There are two different sets of previously entered units (p. 41 & 44)
- Large and medium sized snags are declared to not exist, then they are analyzed with .1/acre.
- Large and medium sized snags are declared to not exist, even though Forest Service flagging is immediately adjacent to them (e.g., on road in unit 17).
- Large and medium sized snags are declared to not exist, but BMPs and project guidelines are promoted as being able to protect them while the analysis shows their complete eradication.
- Why doesn't the cumulative analysis of lost Northern Spotted Owl dispersal habitat include the effects of the previous recent thinning projects?
- The definition of the term "plantation" appears to have become more generalized since the Cloak project. Using "plantation" to mean any land that was logged and may have been replanted or not (which is the reasonable reading of the provided definition) is certainly too vague. If the stands are replanted, then they are plantation. It is disingenuous to the point of dishonest to call natural second growth a plantation because there is a plan to regenerate it in the future. It is also disingenuous to call land, which has an uncertain beginning plantation – if it is not know how it started then say so.
- Section 4.1.5 notes that BLM and private lands will only be analyzed in general terms since there isn't enough site specificity to allow for quantitative analysis. Doesn't the Fish and Wildlife service need that specific information to perform their Endanger Species Analysis? If they have the information, it is not unreasonable to expect that it would be shared with the Forest Service (another Federal agency). If the Forest Service is able to gain access to this information, it is reasonable to expect its inclusion in the project analysis.
    1. Doesn't the F&W have the site-specific information being referenced in 4.1.5?
    2. If F&W has the information, why doesn't the Forest Service use it?

Wildlife

- The PA declares the No Whisky project area is not pileated woodpecker habitat. The fresh pileated woodpecker excavation on the on 4610-115 that people had to walk past to finish their flagging of units 12a and 13

(N45, 12.515; W122, 11.147). If these excavations can be found walking along the road, what does that say about the lack of need to consider this MIS species?

- On p. 52 it is unclear if the required surveys were done. Were the required surveys done?

Riparian

While I support the variable density thinning of Riparian Reserves to aid in the introduction of structural complexity the simplistic approach being promoted by the current plan is not appropriate. While the plan is to "enhance" the Reserves by logging, it is not enough to exclusively thin more heavily and call it good. Riparian Reserve enhancement demands a more thoughtful approach, otherwise all that that is being implemented is a heavy thin which does not treat the Riparian Reserves in a manner that promotes the Aquatic Conservation Strategy (ACS) found in the Northwest Forest Plan (NFP).

- While I appreciate the assertion that the heavy thinning that will occur within the Riparian Reserves will not be enough to influence the ARP ("riparian reserves would not really affect hydrology unless the canopy cover went below 30% to the levels modeled by regeneration harvest" – Jim Roden personal communication), I still think it needs to be done at least once amongst the many projects that are thinning within the Riparian Reserves in the Clackamas River Ranger District. Since single entry Riparian thinning will require a more intensive thin the Forest should do at least one ARP model of the Riparian Reserve (not subwatershed, Riparian Reserve <u>exclusively</u>) after the proposed thinning. This level of planning completeness is expected when pursuing a potentially risky approach to riparian restoration.
- Heavy Riparian Reserve logging has unknown consequences for how well the Riparian Reserves will continue to function as connectivity corridors. What are the references and citations for this approach? Self-referencing your planning document and your own silviculturalist report (see Appendix A, South Fork thin for example) employs irrelevant circular reasoning. The question specifically asks for support for the thinning in terms of how it affects the connectivity corridors and your silviculturalist is an inappropriate reference. For the No Whisky EA it would be appropriate to have your wildlife biologist provide references.
- Significant Forest Service and scientific literature support a larger buffer for intermittent streams. Findings on microclimate, amphibian recovery, avian usage, biological diversity 'hot spots', and intermittent stream roles for fish-bearing perennial streams are documented in Highlights of Science, Contributions to Implementing the Northwest Forest Plan 1994-1998; PNW Science Findings Issue 53; The Effects of Buffer Strip Width on Air Temperature and Relative Humidity in a Stream Riparian Zone

(Ledwith, 1996); Erman et al. 1977; Steinblums 1977; Rudolph and Dickson 1990; Chen 1991; Spackman and Hughes 1994; Pearson, Manuwal 2001; KD Brosofske, J Chen, RJ Naiman, JF Franklin - , 1997; Cummins, Wilzbach 2004;

- The concept that intermittent streams don't need as large a no-cut buffer as perennial streams is logically flawed. Air-borne dust, rain, and rain-on-snow events – primary non-catastrophic mechanisms for sediment transport into local streams operate equally well for both perennial and intermittent streams. Simply put, intermittent streams (streams with enough water flow that they show either annual deposition or scour) are running when you get either rain or rain-on-snow and need the same level of protection as the perennial streams. Airborne dust from summer road travel deposits in intermittent streambeds and on the surrounding vegetation – this dust will mobilize when it rains and the intermittent streams flows again. There is little difference in terms of sediment transport between perennial and intermittent streams and the use of the smaller -or zero- no-cut buffer appears illogical and poorly reasoned.
- With the significant problem of OHV abuse within the LaDee flats area intermittent streams need at least a 50' no-cut buffer to protect them from OHV abuse. OHV abuse appears to target wet areas, and since intermittent streams are wet much of the year they are particularly at risk from this form of abuse. A 30' "or less" buffer is inadequate to protect these streams from this type of abuse.
- Patches of laminated root rot that occur in riparian areas should be left untouched since they naturally act to create canopy openings. Not only do they create these openings, the disease also acts to enhance deciduous growth (very important to creating more diversity within conifer forests) by targeting confers (deciduous maple and alder are immune). The argument that "totally avoiding" root rot patches is irrelevant. When working within the Riparian Reserves a greater level of planning is required, this higher level allows for a stand examination that could catch areas of infection; claiming that it can't be done because you can't catch all the areas is irrelevant.
- Not just root rot should be maintained within Riparian Reserves http://www.fs.fed.us/r10/spf/fhp/top20/HeartRot.pdf --"Heart rot fungi may also facilitate the change from the maturing even-aged stage (i.e., understory reinitiation, to use Oliver and Larson's (1990) terminology) that is in transition to the true old- growth stage. Mortality of dominant trees may be necessary for this transition or at least it speeds the rate of change." Patches identified with native tree disease in addition to laminated root rot that occur in riparian areas should be left untouched since they naturally act to create canopy openings and increase structural heterogeneity. Retention of native pathogens is particularly important in Riparian Reserves as the remaining trees will be more

resistant to disease and the initiation of new decadent trees and snags will be delayed – even though decadent trees and snags remain vital to the proper operation of the Riparian Reserve ecosystem.

- Landings are inappropriate in riparian reserves. While a properly designed landing may have low sedimentation risk and therefore satisfy NOAA Fisheries (see Appendix A, South Fork Thin), once again self-referencing the planning document and using anadromous fish to avoid seriously answering a question about Riparian Reserve actions is inappropriate. The concept of Riparian Reserve found in the NFP is more inclusive than protection exclusively for anadromous fish, consequently the NOAA-Fisheries support is good but insufficient.
- When landings must be created or re-used they need to be removed and the landing restored. Landings damage the soil and since the Riparian Reserve logging will be single entry there is no reason to re-use them. Consequently it is not unreasonable to expect that they will be removed.
- It is completely inappropriate to burn slash on landings located within Riparian Reserves due to the soil damage this would create.
- USGS Biological Science Report USGS\BRD\BSR – 2002-0006 "Managing for Biodiversity in Young Douglas-Fir Forests of Western Oregon" (MB 2002) clearly demonstrates the singular importance of hardwood trees for increasing biological diversity in young managed Douglas-fir forests. The PA currently only specifically protects hardwoods on stream banks. While hardwoods are found on stream banks and their protection is a good idea, it is insufficient within the Riparian Reserves. Within Riparian Reserves all hardwood <u>trees</u> should be given explicit protection.
- In order to increase species diversity found within the Riparian Reserves, all tree species other than Douglas-fir should be protected. While the PA discusses this on p. 44, it is clear that this protection does not include true firs (it is unclear if this discussion is exclusive to the Matrix). Within the Riparian Reserves true firs should be specifically protected along with all other native tree species other than Douglas-fir.
- Riparian Reserves with detriment soils in excess of the Forest Plan standard of 15% should not be logged with any ground-based equipment.
- There needs to be documentation of the protection afforded wetlands and wet areas. Since previous recent Clackamas River Ranger District projects have claimed this protection but never documented it, it is time to produce the documentation.
- There continues to be issues with even the 50' no-cut/no-harvest buffer (43' to wetlands demarked by skunk cabbage & salmonberry & running water on western border of unit 13).
- There continues to be discoveries of unprotected wetlands (e.g., open pooling wetlands with running water with boundary marker 10' away

[western edge of 12a] at N 45, 12.393; W 122, 11.447 or the sedge-filled wetland on the western edge of unit 12a with the boundary flagging directly above it).

- While wetlands can be marked with flagging but that doesn't mean they are protected. Evidence of the lack of protection provided by blue flagging alone can be seen on the northwestern edge of Cloak 465. Even though the unit field marking clearly shows an indentation (protection of something along that edge of the unit), this flagging did not stop the harvester (? Tracked vehicle) from driving right through. Driving tracked vehicles through wetlands protected by nothing more than flagging doesn't actually provide protection.
- OHV abuse needs to be aggressively targeted when it occurs within the Riparian Reserves. This is necessary to comply with the ACS and with NFP Standards and Guidelines B-19 and C-7.

Soil

- Forest plan standards on detrimental soil conditions were written with logging in mind. While it is understandable that exceptions to this standard would be expected (hence the use of should rather than shall), it is abusive to use this exception on 65% of any project, including this one.