



## **Bark**

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Jennie O'Connor  
Hood River District  
US Forest Service  
6780 Highway 35  
Parkdale, OR 97041

Re: Bark Comments on 2008 Pre-Commercial Thinning

February 25, 2008

Dear Jennie,

Thank you for informing us of the proposed 2008 Precommercial Thinning. We write with concern for the potential of this project to surpass the practical use of a categorical exclusion, damage riparian ecosystems, and negatively impact the agencies relationship with the public. We hope to speak more with you about our concerns and the agency's plans for the future, with regards to commercial logging projects.

The Forest Service proposes to "categorically exclude" this work under the National Environmental Policy Act (NEPA). The NEPA defines a categorical exclusion (CE) as "a category of actions which do not individually or cumulatively have a significant effect on the human environment...and for which, therefore, neither an environmental assessment nor an environmental impact statement is required." 40 C.F.R. § 1508.4. The Forest Service Environmental Policy and Procedures Handbook states that a proposed action may be categorically excluded only if the project falls under one of the categories listed in 7 C.F.R. § 1b, or one of the categories listed in section 31.12 or 31.2 of the handbook.

The use of categorical exclusions specifies that the agency must determine that no extraordinary circumstances exist. (FSH 1909.15-2007-1, 31.2) This proposed project takes liberties with this definition, assuming that logging over 1,000 acres of forest designated as Riparian Reserve is *not* extraordinary. The interpretation of Category 6 as used for riparian restoration is not acceptable. Assuming Category 6 was chosen for section b. – "thinning or brush control to improve growth or to reduce fire hazard including the opening of an existing road to a dense timber stand" – we ask that the

Forest Service seriously consider if this could truly achieve the Aquatic Conservation Strategy Objectives as stated in the Northwest Forest Plan. Without an environmental analysis, this proposal is assuming a loose interpretation of this categorical exclusion.

Additionally, the project is intended to preempt the next six years of timber sales within the district. Therefore, cumulatively this work is part of the larger, long-term action of the district and will have a very direct and significant impact on the health of the forests and watersheds in the area. The use of categorical exclusion is defined to not have a significant effect, cumulatively. The maps provided are very difficult to view the many units to give specific comments on the site-specific impacts from this project. However, it is clear that this proposal, followed by continued commercial harvest in these stands throughout the district and will pose risks to water systems in the Hood River drainage and disturb recreation areas.

Added to the cumulative impacts of this project are the proposed Gibson Prairie and Bear Creek Off-Highway Vehicle (OHV) areas. In the coming years, should these proposals progress, they will be heavily advertised within the OHV community and the Forest Service must be prepared for a more rapid growth period and an increased intensity to the consequences of this activity. In Bark's experience any increased access into the forest is often accompanied by increased OHV use (legal or illegal). If it is determined that this project could open up the forest for easier access by OHV groups, then we would expect an environmental assessment. In the coming years, should the OHV areas as proposed progresses, these areas will be heavily advertised within the OHV community and the Forest Service must be prepared for a more rapid growth period and an increased intensity to the consequences of this activity.

In the scoping letter the proposed action states, "If the analysis indicates that the fuel loading is in excess (greater than 15 to 25 tons/acre) of Forest Plan standards and guidelines (FW-033)..." Bark would like to know how this will be measured for the over 5,000 acres proposed for treatment. Based on past field trips with Hood River and Barlow District staff, there is already a high fuel loading on the ground in much of the district, and it is highly likely that the treatment will surpass standards. If so, and a plan to deal with fuel loading is drafted, we request more clarification as to whether mechanical equipment will be used for felling, masticating or removing the trees. In this case, we would expect an environmental assessment to be completed.

This proposal is a 5,774 acre categorical exclusion. The use of categorical exclusions has been an ongoing controversy, especially in the Hood River and Barlow Ranger Districts. The recent Tap (2006) and Eightmile (2007) Timber Sales, in which hundreds of acres were clearcut using CEs has left us skeptical of the continued use of CEs. The following issues are common symptoms of the use of CEs and are of specific concern in relation to this proposal: a shortened comment period, information not being posted on the agency website, inadequate maps of the project area (the electronic file is too large for my computer to zoom in on), seasonal restrictions on access into most of the proposed area and a considerable lack of clarification in the

scoping letter. The Hood River district has been a part of the forest-wide and national movement towards a more collaborative approach with the surrounding communities. Using this truncated environmental analysis process has had an effect of impairing citizen involvement.

The scoping letter, in part, reflects an intention to achieve restoration goals. Mt. Hood National Forest is implementing a forest-wide “Restoration EA” process to analyze all restoration opportunities for the forest. We request that the pre-commercial thinning proposed for Riparian Reserves (the restoration component cited in the proposal) be removed from the 2008 Precommercial Thinning proposal and analyzed as part of the “Restoration EA” process. The result will be that the other portions of the proposal can be analyzed based on the fact that the purpose of the thinning is to prepare stands for ongoing commercial harvest.

In conclusion, we request the following:

1. Include the cumulative impacts of the proposed off-highway vehicle areas in any environmental analysis that will be done around this proposal.
2. In the future, ensure that the public has access to the resources needed to understand the agency’s projects. With regards to this project, we request more information on the plans for dealing with fuel loading and complying with the Northwest Forest Plan, including specifics on where different treatments will be applied, and map(s) that are less than 3 MB so that it can be viewed without access to a powerful computer.
3. Separate the components of the proposal that are restoration-based and those that are intended for future silvicultural treatments.

Thank you,

Amy Harwood  
Program Director  
Bark