BARK
PO Box 12065
Portland, OR 97212
503-331-0374
www.Bark-out.org

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Mr. Andy Tierney
Project Leader
Hood River District
(541) 467-5103
atierney@fs.fed.us

Submitted by e-mail to comments-pacificnorthwest-mthood-barlow@fs.fed.us

RE: Bear Springs Plantation Thinning Project

Dear Mr. Tierney:

Thank you for the opportunity to comment on the Bear Springs Plantation Thinning Preliminary Assessment (PA). This project would log 1664 acres of forest located in both matrix land and riparian reserves, and would provide for post-logging underburn treatments on 616 acres. The project also includes temporary road construction followed by decommissioning.

Bark has nearly 5000 supporters who use the Mt. Hood National Forest, including the areas proposed for logging in this project, for a wide range of uses including, but not limited to: hiking, hunting, fishing, birding, irrigation, non timber forest product collection, nature study and spiritual renewal. We submit these comments on behalf of our supporters and include by reference all comments received by our supporters.

Bark believes that our public lands should provide **healthy ecosystems, not commercial logging opportunities**. We need to move away from a model of tree farms in the forest, and towards a recognition of the true value of these lands: as habitat for a wide diversity of plants, animals and fungi; as vital providers of carbon storage, healthy air and water quality; and as places for people to explore and enjoy the natural world in low-impact ways. *We applaud the decision to include underburning is some of the units*. This is a meaningful step toward creating disturbance that ecosystems recognize and can respond to, encouraging a diversity of tree species while limiting the dangers of fire. Bark is also pleased to see the Forest Service requiring obliteration of temporary roads to limit unauthorized access, and we look forward to working with you on upcoming road decommissioning efforts in the Barlow District.

We have significant objections to the project is several areas. Please consider the following concerns, questions and comments for the proposed Bear Springs timber sale.

<u>Project is Too Large for Meaningful Public Involvement</u>

This project is too large for meaningful public involvement in the decision-making process, as required by NEPA (National Environmental Policy Act of 1969, 42 U.S.C. §§ 4321–4370d (1994 & Supp. III 1997); 40 C.F.R. § 1500–1508.28 (1998). This project should avoid decisions that are rendered in an arbitrary and capricious manner which would be in violation of the Administrative Procedures Act (Administrative Procedure Act, 5 U.S.C. §§ 551–559, 701–706, 1305, 3105, 3344 (1994 & Supp. III 1997). The immensity of this project prohibits an adequate site review; the ecological diversity of the logging units prohibits an adequate analysis of the environmental impacts.

NEPA engagement is crucial to Bark and our supporters because it allows the public to better understand the true nature of proposed actions and their impacts on the Mt. Hood National Forest. As described below, it is clear that the sheer size of Bear Springs, together with the short time frame for field-checking and comment, and the fact that "final" environmental analysis will not emerge until the public has lost the ability to comment, has made it impossible for us to adequately review this proposal.

Over the course of several weeks, Bark volunteers visited the project area and found significant discrepancies between conditions described in the PA and conditions on the ground. Because of the size of this sale (over 1600 acres in 83 separate logging units, spread out over a 62.5 square mile planning area), we were not able to visit all of the units, and were not able to perform a comprehensive review of the proposed units we did visit. However, over the course of approximate 80 work hours, volunteers visited 32 units (38% of the sale) and checked for basic alignment between PA documentation and conditions on the ground, investigating unit boundaries, roads and riparian areas, as well as typical forest structure conditions. In 12 of the visited units (28%), significant differences were observed, including areas of much older forest included inside unit boundaries, differences in age and stand conditions, wetlands not marked on the maps, the presence of a trout-bearing irrigation canal not marked on maps, and the absence of at least three "existing road" segments, as defined in the PA, which would be needed for unit access (see specific unit notes.)

If the Forest Service, with its resources and expertise, cannot adequately field check the project prior to issuing the PA, it is unreasonable to expect members of an engaged public to do so. **We request that this project be withdrawn until all logging units have been field checked by Forest Service personnel and documents redrafted with correct information. We further request that this project be divided into several separate proposals with more manageable geographic or ecological boundaries.**

We also have concerns with the time frame for public involvement in this project. Bear Springs first appeared in the SOPA in January, 2010. A scoping process to request public input for this project was announced through a letter mailing on March 12, 2010. Both of these notifications were released when the area was completely under snow and impossible to field check. As well, proposed units were not field marked (and remain unmarked) and neither of these initial notifications were accompanied by useful maps.

When an EA is issued for the project(s), we request that the Forest Service open an additional 30 day comment period to allow the public to offer our comments on the agency's analysis of the environmental effects and possible mitigation for the proposed action. This would allow the public time to determine whether the mistakes in the PA have been corrected. It would also help create a transparent proposal so the public can have a meaningful say in their public lands, and the agency can help foster trust with

the public.

Project relies too heavily on "Adaptive Management"

We believe Bear Springs PA leans too heavily on the concept of adaptive management, where "exact treatment details may be adjusted at the time of implementation. For example

> • Logging systems shown on maps may be adjusted based on actual slopes encountered and the analysis of feasibility. For example, at this time it is not known if skyline logging is feasible until profiles are taken and analyzed.
> • Riparian buffers shown on maps may be adjusted based on actual riparian conditions. Unit boundaries may be adjusted to reflect on the ground conditions.
> • Unit boundaries may also be adjusted to reflect the actual plantation stand boundaries" (PA 26).

It is one thing to allow for flexibility in the field when conditions change in minor ways, and quite another to avoid thorough project planning. Our ground research has revealed many significant discrepancies between the PA and conditions on the ground (e.g., "existing" roads that are not there, discrepancies in canopy cover, diversity of tree species present, Lost Boulder Ditch not analyzed in the PA, etc.) that could easily have been avoided with adequate field work prior to issuing the PA. At minimum, unit boundaries, roads, riparian areas and typical stand conditions should be thoroughly checked before issuing a decision.

Project does not comply with the stated Purpose and Need and will not meet Desired Future Conditions

The PA states that one of the purposes of the project is to enhance diversity. The PA claims that the units do not have adequate diversity of tree species, tree size and spacing, lack suitably diverse vertical and horizontal structure, lack adequate sunlight on the forest floor, and lack adequate forage plants (PA 6). Yet in 12 of the 32 units we visited, we noted stand conditions that directly contradict the PA, including healthy conifer diversity, variable tree spacing and structure, and canopy closure that appears much lower than the "current canopy closure" listed in the PA (15). In several of the units we visited, Desired Future Conditions have been met, or the forest is well-aligned with DFC goals already. Forest stands have low levels of disease, insect or storm damage, are healthy and vigorous with adequate tree spacing for future growth, contain quality DWD, excellent forage and thermal cover and a highly diverse understory.

The prescription for this sale seems to be based in large measure on the difference between existing and target canopy cover. Because our field review indicated significant differences with the PA in existing canopy cover, and because canopy cover is notoriously difficult to estimate without extensive field work, we are concerned that the agency may not have adequate or accurate data to base the project's purpose and need claims on. For example, estimating coniferous forest cover from aerial photography is virtually impossible, due to shadows and off-nadir view angles. This difficulty is made even worse by the large size of this timber sale (i.e., view angles in photography would vary across the sale area, making it impossible to calibrate a visual relationship to real data). Reliably estimating the cover for each stand would require a significant amount of fieldwork. **Please provide your methodology for measuring canopy cover in these units.**

The prescription for this sale does not adequately describe how logging will meet the purpose and need objectives for this project. How will the Forest Service ensure that units

are not simply high-graded to achieve target canopy cover percentages? What tree size classes will be cut to provide the targeted canopy cover in each unit? How will leave trees be marked? As well, several of the units contain large, natural gaps and clearings. How will you recognize these natural openings in your prescriptions? Will these be counted as gaps? How will the forest service ensure that areas of "heavy thinning" are sited to meet the purpose and need as well as the Desired Future Conditions objectives of this project? Please define heavy thinning, and describe how much of this practice will be used on a unit-by-unit basis. We assume that average tree diameter in each unit would increase immediately as a result of this project; however, we could find nothing specific to this effect.

Bark is concerned that a number of units appear to contain trees or stands outside the prescribed age class of 30-60 years. **We request that any portions of stands outside the 30-60 year old age class be identified in the decisions and excluded from this sale.**

Roads

Road density throughout the project area already exceeds 3.0 miles per square mile (PA 54) and reducing road density in the White River watershed is a stated priority of the Forest Service. The latest figures on open road density in the White River Watershed show the road density is 5.13 miles per square mile, which is over two times higher than the threshold set forth by the Mt. Hood Land and Resource Management Plan (LRMP). We agree that "road decommissioning will have a positive effect" on endangered and sensitive species (and wildlife in general), stream health and water quality, reduction of noxious weeds, reduction of illegal OHV activities, and many other forest values. We are pleased that the Forest Service is prioritizing road decommissioning efforts, and look forward to the next increment (Increment 3) upcoming in this planning area. However, we are concerned that this project will create new roads and will make decommissioning of existing roads more difficult and costly, ultimately weakening the promise of this new priority.

We request that any units which would require construction of new roads be dropped from the project. In 3 units we visited (102, 104 and 22); we noted the absence of primary haul routes indicated as existing in the PA. In two of these units, the proposed path of these roads would require new stream crossings over a fish-bearing canal. (See specific unit notes for details.) As we were not able to visit all the units due to the immensity of the project, there may be more units with this issue.

As well, any road segments which will require construction beyond the minimal work identified in the PA should be considered new roads. The PA indicates that the project will use "2.7 miles of previously decommissioned and temporary roads that were passively or lightly decommissioned that can be reopened with minimal earth movement" (PA 58) and will construct 0.8 miles of new temporary roads which will be obliterated upon project completion (PA 14). However, our field visits indicated that several sections of these "passively or lightly decommissioned" road segments are either non-existent or fully out of service and reopening them equates to new road construction. As well, many of the road segments listed as primary haul routes, and requiring only "brushing, blading, drainage and surface repair" (PA 13), are actually passively decommissioned roads which will require more work to reuse. Several of these haul route segments do not appear to exist at all. How will you ensure that there is, indeed, "no net increase of new roads in this key watershed" (PA 60, 70)?

We request that any roads identified for decommissioning within the Increment 3 planning process be decommissioned without delay. If any of these road segments

will be decommissioned "after the implementation of the Bear Springs project" (PA 116) we request that these roads are decommissioned *immediately* after the Bear Springs project. We are concerned that overlapping logging proposals, including the current Eastside pre-commercial thin, will result in indefinite delay in road decommissioning, when immediate action is needed in this heavily fractured watershed. As well, road decommissioning and other restoration work should not be contingent on timber sale revenue.

Even when temporary roads or haul routes can be rejuvenated with minimal earth movement, significant and long-lasting environmental impacts occur. Forest health doesn't automatically return to its prior level as soon as a road has been decommissioned, just because the Forest Service removes the road from its inventory (PA 61). It often can take 20 years to successfully re-vegetate a road; in the meantime, the environmental impacts of the road remain. This is especially true when "decommissioned" roads are never intended to disappear, but are essentially stored for future projects which further compact soils and re-impact the area. This type of "decommissioning for storage" negates many of the claims of ecological recovery touted in the assessment. A thorough analysis of the impacts of existing road rehabilitation and temporary road construction in this project should be included in the EA, including specifics about which roads are going to be closed, for how long, and which are likely to be reopened in the future.

Page 24 of the PA indicates that "landings and temporary roads normally would have erosion control measures installed following fuels or reforestation treatments" but that "temporary effective closure" may be used instead if the logging extends beyond the current field season. We are concerned that temporary closure will not adequately address erosion issues and possible sedimentation downslope, especially in units with steep slopes, and request that erosion control measures be installed in units immediately following logging, whether or not the work extends into multiple seasons.

The proposal also includes the possibility of winter logging. Bark would like to see a more detailed analysis of the risks and benefits of winter logging before it occurs, including an analysis of the impacts of special measures taken to mitigate travel on winter roads, for instance "rocking or other special surfacing and drainage measures [which] may be necessary before the operator would be allowed to use the roads after snowplowing" (PA 24). As well, the PA states that "because the margin of difference between not detrimental and detrimental soil damage can be so slim under moist to wet soil conditions, monitoring of the logging activity may need to occur daily, or more, as agreed to by sale administration and soil scientist" (PA 25). The Forest Service is already on a slim budget so why take on the additional cost? If logging during wet conditions would be allowed, we request more information about how this monitoring would be funded and a detailed monitoring and mitigation plan for the project.

<u>Project does not Adequately Assess Cumulative Effects</u>

Bark is concerned with the landscape-level environmental effects of this proposal. The Bear Springs project comprises over 1600 acres in 83 separate logging units, spread out over a 41,000-acre planning area. The individual units span from ponderosapPine plant communities to the mixed middle-elevation forests of abies spp. and tsuga spp. "Vegetation includes mixed conifer forests, meadows and open grassy slopes. Average annual precipitation ranges from 50 inches on the west side to 20 inches on the east side. Elevation ranges from 3000 to 4500 feet" (PA 9). From west to east, the diversity of these units is expansive. We are concerned that because of the diversity in plants, soils, geology,

and other factors across such a vast sale, the PA cannot adequately assess the environmental effects of the project as a whole. The immensity of the project simply prohibits an adequate site review, and the ecological diversity of the logging units prohibits an adequate analysis of the environmental impacts.

Several projects in the same watershed have *cumulative impacts*, which are defined as "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions" (40 C.F.R. § 1508.7). The cumulative impacts analysis of the Bear Springs Timber Sale is inadequate and fails to meet NEPA's requirement for high quality scientific analysis that would satisfy the "hard look" standard. While the PA lists many of the current actions planned or ongoing in the project area (e.g. OHV planning, grazing, Palomar), past logging projects are not adequately addressed, and effects of past, present and reasonably foreseeable future events are not adequately analyzed with regard to species, soil and aquatic resources within the planning area and at a landscape level.

As recently as 1980, this landscape was dominated by 300+ year old Douglas-fir and associated species. The portion of this planning area which overlapped the Broodtree planning area included old growth stands that "support some of the largest volumes per acre found in this district" and comprising "1134 acres, or 68% of the planning area" (Broodtree EA 3). Accelerated clearcutting through the 1980s and 1990s, and commercial "thinning" through the past decade, have decimated most of the old-growth habitat and turned these ancient forests into a patchwork of tree farms.

The Bear Springs timber sale, combined with other recent logging projects in the planning area, such as the adjacent Osprey, Diablo, Bearknoll and Hilynx sales, will contribute to the degradation of at least 5,105 acres. Over 2800 additional acres in the western half of the Bear Springs planning area were "treated" in the last twenty years (BearKnoll EA 47), and the PA reminds us of the legacy of logging in this watershed since 1950: approximately 20,000 acres have been logged, the majority of that through clearcutting (PA 29-30). With all these actions occurring in the same planning area, we believe the Forest Service is obligated to perform better analysis in the EA to assess the cumulative effects of all these proposals on the larger landscape.

Cumulative Impacts on Patch size and Diversity

It is not sufficient to rely on "current environmental conditions as a proxy for the impacts of past actions" (PA 27). While Bark does not expect the agency to catalog the last 100 years of timber sales to-date, we do feel that sales adjacent to the proposed units should be specifically analyzed. Forest fragmentation and patch size are critical issues to consider, especially concerning wildlife and sensitive species, and the PA ignores these concepts altogether. This project, and all future actions, should work to increase patch size, especially in areas with sensitive or endangered species present, such as spotted owl core areas.

One example of the ecological diversity present in the planning area was found during a visit to units 24 and 25. The units themselves contain a tree community dominated by Douglas fir and true fir (Abies spp.), with a dense understory of snowberry. Across the road to the west, where the area was previously clearcut, the forest transitions to the sandy soils of Pinus spp., Larch, chinquapin, ceanothus, and various grasses. 100 yards further, the area transitions into a nice old-growth forest dominated by Western Hemlock and a very diverse understory more reminiscent of middle-elevation forests west of the Cascade Crest. This patchwork of different ecological values is typical throughout the planning area. Because of this, the agency needs to analyze, on a site-by-site basis, how the forest would change through different prescriptions.

Cumulative Impacts due to Grazing

The Forest Service must analyze the cumulative effects of livestock grazing on these allotments and other allotments for which NEPA analysis is concurrently being conducted. (See Inland Empire, 992 F.2d at 981.) While the PA provides a cursory discussion of the cumulative impacts of the action on riparian resources, it does not mention the cumulative effect of livestock grazing on riparian habitats throughout the district, forest or watershed. Even if 'cumulative effects' are difficult to assess, they cannot be dismissed.

The combination of fire suppression, past high-grading, and livestock grazing combined to create the overstocked condition of some of the stands in the analysis area. In one unit we visited, Unit 20, these effects were particularly pronounced: islands of three to five trees with a developing understory were surrounded by 5-foot paths devoid of vegetation. In a clearcut just north of the unit, we discovered a herd of cows, which apparently travel through the unit creating the wide clearings and unusual vegetation patterns. This is one, small example of how the effects of grazing and logging accumulate, and why impacts of these cumulative effects must be considered together in one NEPA document.

Cumulative Impacts to Aquatic Systems

There are numerous ongoing activities in the planning area, such as timber harvest, fishing, camping, road construction, OHV use, grazing, channel stabilization, and culvert repair. However, there is no actual analysis of how the effects of these activities combine to affect the aquatic and riparian environment. NEPA requires the agency to address the impacts "on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions…cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." The aquatic systems themselves are poorly documented. For example, Lost Boulder Ditch, an irrigation canal that runs from the junction of Lost Creek and Boulder Creek within the project area to Smock Prairie in Wasco County is not noted in the PA or the project maps. Trout were observed in the canal on both occasions that we visited the project area.

The EA Must Include a Detailed Monitoring and Mitigation Plan

Monitoring is increasingly important in sound forest management, and is considered a cornerstone of proper management of public lands. NEPA require that agencies "state whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why not. A monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation" (40 C.F.R. § 1505.2(c). **The Bear Springs EA must include a comprehensive plan detailing how the project will be monitored for compliance.** This plan should include information outlining how and when monitoring and mitigation measures will be employed, how much they will cost, what entity (purchaser or USFS) is responsible for their implementation and enforcement, what will happen if the measures are not fully implemented or fail, and other similar considerations. The current system of conducting a "crosswalk" between the NEPA decisions and the contract, followed by specialist visits on an arbitrary timetable or at the request of the commercial logging contractor, has resulted in multiple failures over the years. Bark is concerned that the inadequacy of current monitoring efforts has increased as project size has increased.

We are concerned with monitoring the logging practices associated with skips and gaps. While we appreciate the agency working to create logging in forms that mirror natural disturbances, we are concerned with the lack of detail describing how these practices will be implemented. The PA indicates that "gaps would be 0.5 to 2.0 acre in size and would retain one to six trees. In gaps, minor tree species would be retained if present" (PA 10). How will the Forest Service ensure that skips are placed in areas of higher tree diversity, where good supplies of downed logs and snags are retained and where unique natural landscape features can be preserved? How will natural clearings be incorporated into the concept of gaps? How will the units be marked in advance, and how will compliance be monitored and measured during and post-logging?

We are also concerned about "areas of heavy thinning [that] would be created in a variety of sizes" (PA 36). How will the forest service ensure that areas of "heavy thinning" are sited to meeting the purpose and need as well as the Desired Future Conditions objectives of this project? How will the units be marked in advance, and how will be compliance be monitored and measured during and post-logging? Without even a basic description in the PA it is impossible for either the public or the decision maker to determine whether the proposed action will meet the purpose and need.

Project does not Protect nor Enhance Legacy Features

Processes that sustain the long-term productivity of ecosystems have become the centerpiece of new directives in ecosystem management and sustainable forestry. Given the key role of decaying wood in long-term productivity of forest ecosystems in the Pacific Northwest, the topic should remain of keen interest to scientists and managers during the coming decade. Decaying wood has been likened to a savings account for nutrients and organic matter, both a short-term sink and a long-term source of nutrients in forest ecosystems.

It is noted in the stand-by-stand analysis (PA 15-19) that many of the units are being logged because of disease agents within the unit. Many of these diseases are endemic features and are doing the work of creating snags in the future. Fungus rots and other parasites are crucial to habitat creation. The cavities these diseases create in trees offer habitat that cannot be replaced by down-log snags and other dead-wood habitat. They are particularly critical in the creation of live-wood snags and other structures upon which many species present in the area depend for their survival. They are also part of the process by which stands develop naturally, especially by creating a diverse, dynamic overstory. Finally, while natural cycles of fungus are part of the function of a healthy forest, the stress of harvest can unnaturally spiral infestation beyond the normally occurring levels, creating epidemics which truly threaten the health and vigor of the stand. We encourage the Forest Service not to eliminate trees based merely on the presence of disease but accept the ecological processes that create habitat, downed wood, and the recycling of nutrients back to the soil.

For this forest type, the DecAID advisor identifies the 30% tolerance level for snags as 6.7 snags per acre greater than 10 inches and 2.7 per acre greater than 20 inches in diameter. It identifies the 30% tolerance level for down wood as 2% cover of down wood (including all decay classes) with sizes of logs averaging 5 to 8 inches in diameter. Because "most of the Bear Springs units contain snag and down wood numbers below the 30% tolerance level" (PA 8), the PA prescribes that "all non-hazardous snags would be retained" (PA 11). In order to minimize the number of snags that are lost to logging because of OSHA standards, we suggest that the project buffer areas that are rich in snags so that there is not a short-

term loss in an area already deficient in snags. By leaving all larger trees or legacy features remnant in the units, the area will be better able to recruit larger snags in the near future.. As well, snag retention and legacy features should be a significant factor in deciding where to place skips in the units; all decay features be protected by concentrating them in the layout of skips.

The PA states that "some snags and down logs would be created" (PA 11), but it does not describe the methodology to be used. Given the low success rates associated with certain types of snag creation, a description of the methodology is important information. We suggest that the agency inoculate trees with native fungi to create snags and downed wood instead of simply topping or girdling trees. The area is deficient in habitat and we would encourage the agency to work toward creating new habitat.

Unit Notes

Unit 102 and 104

Both of these units are bisected by Lost Boulder Ditch, a fish-bearing irrigation canal that runs from the junction of Lost Creek and Boulder Creek within the project area to Smock Prairie in Wasco County.. Trout were observed in the canal on both occasions that we visited the project area, along with an abundance of neotropical migrant bird species. Neither the presence nor the significance of this canal is included anywhere in the PA, including the project maps.

In addition, the PA indicates an existing system road 4850018, which is proposed to be used as a "primary haul route" (PA 13). However, in contradiction with the PA road system map, only a small portion of this road runs through unit 104 before heading south and outside the unit into older forest and dispersed camping sites, and this road does not appear to exist at all in Unit 102. If these units were to be accessed using a road path resembling the route indicated in the PA, it would require construction of a new road, crossing Lost Boulder Ditch twice, and cutting through sections older forest.

Because of these inconsistencies, and the serious environmental impacts associated with new road building and logging along the fish-bearing canal, **we request these units be dropped from the sale, in their entirety.**

Unit 70

We request that this unit be dropped from the project. As mapped, the unit includes areas of forest south of spur 4320220, on both sides of road 4320. These areas of the unit are clearly old forest not included in the previous plantation. Further, our investigation of the portion of the proposed unit which corresponds to a plantation, cut after 1980, reveals field conditions clearly in contradiction to the purpose and need advanced for this project. This stand contains at least seven separate conifer species (PP, WWP, DF, WH, MH, GF and SF), significant forage plants, large natural gaps in the forested area, highly variable tree spacing and a canopy closure of less than 50% resulting in plenty of sunlight on the forest floor.

Unit 46

The PA indicates a riparian reserve area on the south border of the mapped unit. However, our field visit revealed a flowing brook and wet meadow on the west edge of the unit, just

south of Road 4800000. A previous temporary road exits the unit very nearby and upslope of the wetland, and we are concerned that new logging activity will lead to significant damage. **The Decision should explicitly identify how this area will be avoided including any access routes to the unit.**

Unit 51

Lost Boulder Ditch (see unit 102 and 104 notes) runs along the south side of this unit, but we were unable to determine how close the unit boundary comes to this fish-bearing irrigation canal. Slopes in the area of the unit upslope from the canal are significant. The forest inside this unit is already healthy and diverse, and meets or exceeds the stated DFC goals. **We request that this unit be dropped from the project. At minimum, we request that extra precautions be taken to protect the canal from the deleterious effects of logging and road activities.**

Unit 50

Road 4850021 connects to Old Barlow Road, in contradiction to the mapped route. Abundant illegal OHV traffic regularly occurs on this stretch of Old Barlow Road.. Currently, the road is difficult to pass on an OHV, and we are concerned that any road improvement will encourage illegal trail riding from both sides of the road. As well, this unit contains large, natural gaps and clearings, including at least one meadow, which should be protected. **Road 4850-021 should not be used to access Unit 50.**

Units 1 and 2

We request that these units be dropped from the project. These units are inside spotted owl core areas, and are surrounded by LSR patches on two sides. Road 2610012 is currently decommissioned. Opening up this road as a primary haul route will require significant disturbance to the LSR contiguous with the proposed units on the west, an additional stress on existing spotted owl core areas. As well, these units are within the scenic viewshed, contain slopes well over 30% and soils with significant erosion potential. Any of these factors could make a unit unsuitable for logging. The combination of all of them should preclude their inclusion in this project.

Unit 19

This unit was a tricky one for groundtruthers to assess. The road that would have marked the southern portion of the unit (the road mapped as leading to unit 22) is nonexistent, and the contours of the road path don't seem to mesh with those on the map. This was alarming to us because there is a nice stand of old growth adjacent to, if not within, the unit boundaries. And stated previously, **Bark requests that any trees outside of the 30-60 year of age range be excluded from this project.**

Unit 22

Groundtruthers were not able to locate the unit and report on the stand conditions inside the unit because the "haul road" leading into the unit per the unit maps does not exist in the field. This road is mapped as an existing haul road in the PA appendix; however it is not identified by road number in the existing road inventory, nor is it identified in the list of proposed temporary roads on page 14 of the PA. We do not feel that the logging of 21 acres warrants the creation of nearly a half mile of new road. **We request that this unit be**

dropped from the proposal.

Units 24 and 25

The southern portion of Units 24 and 25 are both approaching the 30% slope that would warrant sky-line logging**,** though the PA states that ground-based logging will be used. Coupled with the fact that these units are directly above Clear Creek, we are deeply concerned that logging these units will damage the stream. There has already been extensive logging to the southwest of the unit, and we are concerned about the cumulative effects to Clear Creek should logging extend down this slope. **Unit boundaries should be adjusted to eliminate this risk.**

Units 34, 35, and 36

Unfortunately these are but a few of the units that Bark was unable to get field-checked due to the time frame in which this proposal was put through. These three units are also all on slopes in severe to moderate erosion potential areas, directly above Gate Creek. Trees in units 35 and 36 are bigger in girth than most of the units in the proposal. We would like to learn more about these units in future documents, and we hope to visit these units sometime in the near future.

Thank you for considering our comments and concerns. Please incorporate by reference the photographs from our groundtruthing at:

http://www.flickr.com/photos/barkformthood/sets/72157624438647860/

We will continue to update our visits to this proposed logging project through this site, additional groundtruthing forms and notes from our public hikes.

Sincerely,

Candace Larson, Chair
Bark Forest Watch Committee

and

Gradey Proctor, Member
Bark Forest Watch Committee

on behalf of Bark