



## **Bark**

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Linda Goodman, Regional Forester,  
USDA Forest Service, Region Six  
ATTN: 1570 Appeals/Objections  
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Dear Ms. Goodman,

Thank you for the opportunity to comment on the Billy Bob Hazardous Fuels Reduction Project on the Barlow District. Bark represents almost two thousand members who are concerned with the Forest Service's continuing endeavors to commercially log Mt. Hood National Forest.

As you are aware, Bark was originally a member of the collaborative group working on this project. Unfortunately, we were not able to continue working with the group due to our participation in other collaborative groups stretching our resources. We were pleased to see recommendations from the collaborative group incorporated into the proposed action with regards to canopy coverage in Unit 21, however discouraged to see no plans for road decommissioning.

In parts, this environmental assessment was a robust look at the impacts of this project. I particularly appreciated some of the cumulative impacts and historical context components of the document. Bark has been asking the Forest Service to include specific past and current harvest history as part of the cumulative impacts consideration for years now. We find this very encouraging to see that the Forest Service recognizes damage that occurred from past management and how future logging in the area will increase that damage. As well, the historical use of the land both culturally and as a resource was not only relevant to the planning of the project, but also helpful in understanding that the imbalance which exists in this forest can be traced back to a hundred years of misuse. Although, we acknowledge the Forest Service has limited resources and expecting a full history report with every EA is not realistic, I find this context and willingness to think in the long-term (even long-term in the past) to be an assurance that the agency is willing to think beyond the available timber harvest when managing the public's land.

While we continue to have concerns about the use of decommissioned roads, I also found the data and information regarding log hauls and reasoning for routes to be

much more in depth than we have come to expect from timber sale EAs. When individuals and groups like Bark approach these comments we grow frustrated with the lack of site-specific, project-specific information. By bringing the public into the planning and conceptualizing of the project, the reader can become much more engaged in specific concerns, rather than coming away with an overall skepticism of the effort to analyze what impacts this action could have.

Our biggest concerns with this timber sale are the use of decommissioned roads and the cutting of snags. We also have concerns with the conflict this project may cause with recreation needs in the direct vicinity.

Bark recommends the following changes be made to the proposed Billy Bob Hazardous Fuels Reduction project:

- Remove all logging of snags
- Do not build temporary roads
- Add road obliteration to the proposal
- Do not allow snowplowing
- Remove Unit 23 from the proposal

Bark believes that incorporating these recommendations will have a minimal impact on the ability to achieve the goals of the Billy Bob collaborative group, improve the experience of Boy Scout's at Camp Baldwin, and comply with applicable management direction.

## **SNAGS**

Many studies have come out recently assessing the great need of snags for habitat and their great lacking from forests in the Pacific Northwest. One study by Bull et al. for the Pacific Northwest Research Station, notes that the Forest Service's standards for snag retention are insufficient to provide adequate habitat for species that depend on snags. See Pacific Northwest Research Station, United States Forest Service General Technical Report, PNW-GTR-391. Indeed even the Forest Service has recognized that snags are in short supply across the landscape. Pacific Northwest Research Station, United States Forest Service, Science Findings Dead and Dying Trees: Essential For Life in the Forest. (Nov. 1999). How will this proposal affect the overall watershed for snag availability now and in the future?

Northern spotted owls, bats, martens, woodpeckers, bears, and many other species are dependant upon snags and downed wood. Snags and downed wood also serve several crucial ecosystem functions and serve as the "primary constituent elements" which are those "physical and biological attributes that are essential to a species conservation" in designated NSO Critical Habitat. Current direction for protecting and providing snags and downed wood does not ensure the continued operation of these ecosystem functions nor does it meet the needs of the many species associated with this unique and valuable habitat component.

The pileated woodpecker is vital to the forest because it is the primary excavator that creates cavities that create habitat for a multiplicity of wildlife. Recent studies have shown that, "cavity users typically represent 25 to 30% of the terrestrial vertebrate

fauna in the forests of the Pacific Northwest.” (Bunnelle et al. 1999). This study goes on that a “lack of cavity sites is the most frequently reported threat to “at-risk” species in the Pacific Northwest.” With a species so vital to forest health, it is discouraging to read that though habitat is present in the area this proposal would eliminate some of the important habitat still available. Has the agency conducted recent surveys to see if the pileated woodpecker is using the area?

One critter in particular that depends on cavities for nests is the northern spotted owl. According to the Scientific Evaluation of the Status of the northern spotted owl, in the southern portion of Eastern Washington 23% of the owls were using cavities for nesting sites. It is a simple principle of succession that the beetle, and the blue staining fungus it carries, infects the tree. The woodpecker creates cavities seeking out the beetle as a food source. Over time through weathering and the work of other inhabitants these cavities are expanded to a size that eventually may be used by the northern spotted owl. This report cited that the “protection of all existing suitable owl habitat may prove important to the persistence of the owl.” Please explain how removing snags and pathogen infested trees, which are highly likely to *become* snags in the very near future will protect all existing habitat and contribute to the recovery of the northern spotted owl?

In the consideration for Wildlife Resources, where the cumulative impacts of surrounding logging projects is included in the analysis, there is not mention of the Eightmile Meadow Timber Sale which is currently being logged less than ten miles southwest of the project area. “Cumulatively, Fivemile Planning Area, City of The Dalles timber harvest, The Dalles Watershed Fuelbreak, and Billy Bob Hazardous Fuels Reduction projects impact spotted owl habitat negatively. All projects downgrade, remove or degrade habitat. The purpose of the Billy Bob Hazardous Fuels Reduction project is to protect the Wildland Urban Interface (WUI) from catastrophic wildfire. This would also protect the spotted owl habitat within the Billy Bob project area causing a positive cumulative effect.” (EA, 3-91) This is a convoluted look at the positive effects. Is the Forest Service implying here that by logging to prevent future forest fires, habitat is being protected? If logging occurs, particularly the felling of snags, than habitat loss is guaranteed. In particular, when looking at the guaranteed loss from other nearby logging projects, how can this EA possibly argue that there will not be an effect on such sensitive species as the northern spotted owl, pileated woodpecker, pine martens and other cavity dwellers.

Felling snags as hazard trees is an unnecessary “safety measure” and is no replacement for good education about the forest ecology and the risks of being in the forest. The mission of Boy Scouts is to engage young people in responsible behavior and encouraging good public citizenry. Why wouldn’t better education around forest safety and awareness be a solution to the safety concerns for the scouts, rather than having to sacrifice this incredibly important habitat component to the forest?

## **ROADS**

As stated before, Bark was not able to continue participating in the collaborative group. We were pleased to see that the collaborative group had made recommendations to include road decommissioning in the project. We concurred that

this should be included and added some of our own recommendations in our scoping comments. The EA responds to our concerns by claiming that it is outside the scope of the project. However, it does not discuss the collaborative group's recommendations. We ask again that this critical issue be addressed, particularly if the Forest Service is considering to use a stewardship contract for Billy Bob. Since the idea of stewardship contracting is to use it for restoration, it would make sense to include restorative activities like road obliteration in the final decision.

Bark absolutely discourages the creation of temporary roads for logging purposes. Although the EA states that these roads will be "rehabilitated" after use, we have rarely seen a successful obliteration of these roads. There are approximately 4,000 miles of roads in Mt. Hood National Forest. According to the 2003 Roads Analysis, more than half of these are unnecessary and candidates for removal. However, the Forest Service has proved to be unable to keep up with this needed work. Adding to the backlog with these temporary roads is a disservice to the public's interest in clean drinking water and safe access on other roads to recreation destinations.

Bark volunteers have recently done some surveying on the roads in this area. The Miles Watershed Analysis sites Eight Mile Creek as a priority area for potential erosion problems and recommends coming up with a management solution for suitable stream crossings, particularly as it pertains to off-highway vehicles and equestrian needs. (The Miles WA 122)

Bark has witnessed some of the intensive off-highway vehicle use throughout Mt. Hood National Forest and is wary of any new actions that might open up new access opportunities. We had hoped for a thorough analysis of all temporary use of new and/or closed spur roads and the risks of unsuccessfully deterring riders from using these roads once they have been used and appear to be accessible, again. Spur road 4460-017 has an ineffective closure with OHV use penetrating the forest. As well, culverts on this road are functioning as ditch relief for road runoff. Should motorized vehicles (including logging trucks and snowplowing vehicles) continue to use this spur road, this runoff will be meeting up to an Eight Mile Creek tributary with no possibility for filtration, putting fish habitat and water quality in direct harm.

We fully supported the recommendation made by the collaborative group for Road 4440-120 and all spur roads from 120 be permanently obliterated. Bark also recommended that the Forest Service to do a full assessment of the status of the culverts throughout this planning area and include potential risks in continuing to use these old roads for large-scale logging operations. The weight of haul trucks is known to have an impact on the road and has led to increased culvert crushing. It is important that the Forest Service begin to incorporate the risks involved with continuing to use unsafe logging roads and the impacts these old roads will have on the forest as they deteriorate with use and lack of maintenance.

*Although on a unit to unit level in any one timber sale, a short temporary road may not seem like an intrusion to the forest, taken into consideration of all the other actions listed in the past harvest history, compacted with other current harvest activity and put on a landscape perspective, this impact begins to build up.*

The Billy Bob EA does not include a definitive number or amount of temporary road building and refers to a map available in the project record. Why not include this map in with the EA? It seems entirely relevant, particularly in light of the fact that not only the collaborative group's recommendations and Bark's scoping comments expressed concern for road use in this plan.

Bark would also like to see more stringent seasonal restrictions on this sale. The use of snowplowing on gravel roads is host to many lasting issues from sedimentation to erosion and expansion of the road bed. The EA states that roads were analyzed assuming normal operating season (June-October), however page 2-11 does allow for snowplowing off-season. We understand that pre-commercial work is sometimes done in the off-season, but we strongly discourage any activity that would require snowplowing.

“Hauling during freeze/thaw conditions has damaged the surface and base materials. As frost penetrates the road prism, it pulls moisture up into the subgrade and base course material, saturating the subgrade. When the moisture in the subgrade and base course freezes, the ice expands, pushing soil and rock particles apart. This action reduces the compaction in the subgrade and base course, which in turn reduces the structural capacity of the road...Snowplowing for use would accelerate damage caused from saturated soils and freeze/thaw. It would also set up a corridor for collecting and concentrating water during rain-on-snow events that could accelerate damage to the road and drainage structures.” (EA, 3-41)

### **UNIT 23**

Bark requests the removal of Unit 23 from the project proposal for the following reasons:

- The use of road 4430-150 for logging operations is inappropriate. This road is unnecessary and should be removed, as it crosses Eightmile Creek twice in a loop formation.
- This unit contains the Eightmile Crossing campground. Commercial harvest around campgrounds is not acceptable.
- This unit also contains Trail 459. As with the nearby Eightmile Meadow Timber Sale, logging along hiking trails is not an acceptable practice for a national forest that has a higher rate of visitors than almost any other national forest in the region.
- This unit was identified in the EA as having the Wolf Run Ditch running through it. The EA includes a 50-ft buffer around the ditch, however compacted with the other destinations in this unit, the presence of an important archeological site offers another compelling reason for dropping this unit from the planning area.

### **OTHER CONCERNS WITH THE PROPOSED BILLY BOB PROJECT**

#### **Fire and Pathogen Reduction**

The EA states that this area falls in a WUI and logging will be in accordance with the Wasco County Community Wildfire Protection Plan. (EA, 1-1) While the EA is clear

about the resulting imbalance in the forest from years of fire suppression, a justification for thinning is not established. The Wasco County CWPP does not identify logging forests around Camp Baldwin as part of their actions for protecting communities at risk. And although the area does meet the standards of a wildlands urban interface with the Boy Scouts private holdings, we find it unrealistic to continue managing the lands surrounding the property as if it could be spared in the event of a high-intensity fire.

In Table 3-2, the EA states that cumulatively this project has 43% Condition Class 1 & 2. Although there is not a further breakdown of where this percentage lies in the proposal, the units of underburning and pruning (presumably, the lightest touch) do not seem to make up 43% of the planning area. Are there units included in the proposal with plans to fell trees in Condition Class 1? Do these units (excepting Unit 21, with its own stated purpose) meet the need? With regards to fuels reduction projects, it seems entirely appropriate to connect the analysis of condition class with the proposed actions for the public to clearly see in a NEPA document. We do not support the felling of trees in areas deemed Condition Class 1.

With regards to pathogen control, the EA states, “Timber harvesting has been a major contributor to the change in vegetative conditions that have occurred across the project area.” (EA, 3-31) This has to bring up the question; why does the Forest Service use logging as a restorative method?

### **Legacy Trees**

We do not see why the Forest Service could not commit to avoiding mature trees in this thinning project. If the concern for the larger trees is for continued propagation of pathogens to the smaller trees below, wouldn't this concern be taken care of with the removal of the grand fir and other new growth coming in at unnatural rates? Dwarf Mistletoe is a natural pathogen in older Douglas-fir and western larch. (EA, 2-2) We strongly question the purpose and need of this project knowing the Forest Service is unwilling to accept that older stands in this area are rare and removing them (infected or not) only puts the forest back further in recovering to natural conditions. Whereas prescribed burning will reduce the unnatural undergrowth, encouraging a more natural regeneration and stand replacement is a short-term boost for a long-term goal, removing trees that are older than the mismanagement itself is a foolhardy attempt at “fixing” nature. In many ways, the large and mature trees that have survived the insatiable logging practices of the past are our only hope for the forests to recover.

### **Mt. Hood LRMP**

The list of standards and guidelines from Land and Resource Management Plan that this proposal would not meet is disconcerting. (EA, 2-12) We were made aware of the changes that were proposed in the Visual Quality Objectives by the Forest Service and are pleased to see that those changes will not be made outside of the revisions process expected to happen in the coming years. However, the EA does an inadequate job of justifying why the other stated standards and guidelines will not be met.

The EA states that the Forest Plan does not allow for flexibility outside of “traditional” timber sales. (EA, 2-12) However, fuels reduction is *traditionally* imposed on the forest

as a way to maintain and encourage maximum growth for future harvest potential. Although the purpose and need of this project does not include a harvest need as with other timber sales, this project will be sold commercially and does still need to appeal to commercial logging interests. While there may be actions the Forest Service can do to truly begin to restore the natural integrity of the forest (such as road removal) the Mt. Hood National Forest has not shown to be successful with a restorative objective through the commercial timber sale program. Not adhering to the Forest Plan when it is convenient for interested parties corrodes the effectiveness of that document as a baseline expectation between the public and the agency. Please give better justification for not being able to meet the following guidelines:

Detrimental Soil Impacts

Organic Matter

Downed Wood Material

Silvicultural Systems: “management should not be applied on slopes where cable logging systems would be necessary (30+% slopes).”

Thank you for taking the time to review our concerns. We anticipate the final decision on this project and hope our input will be considered. If you have any questions, I can be reached at 503-331-0374.

Sincerely,

Amy Harwood  
Program Director

cc:  
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