



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

03/26/2015

John Huston
Bureau of Land Management - Salem District Office
1717 Fabry Road S.E.
Salem, Oregon 97306
RE: Little Chair Salvage Project CX Comments

Dear John,

Bark's mission is to bring about a transformation of public lands on and around Mt. Hood into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation. Bark has over 25,000 supporters¹ who use the public land forests surrounding Mt. Hood, including the BLM managed areas proposed for logging in this project, for a wide range of uses including, but not limited to: hiking, nature study, non-timber forest product collection, spiritual renewal, and recreation. We submit these comments on behalf of our supporters.

Bark has been a major stakeholder in the areas proposed for post-fire logging for the past 15 years, and has concerns about the way the agency is visioning active management of this forest, which has just experienced a major natural disturbance. We request that you actively engage with the substance of these comments and use both the scientific and site-specific information herein to create a better project for the Clackamas River watershed.

The Little Chair Salvage proposes to log 35-50 acres of BLM land burned by the 36 Pit Fire, in addition to constructing up to 0.10 miles of new roads. Other activities include decommissioning or closing roads, improving or replacing culverts, and reforestation (although details and locations of these activities are unknown).

¹ Supporters in this case is defined as significant donors and petition-signees which Bark has identified as being active users of Mount Hood National Forest.

The Little Chair Salvage Project is (so far) being proposed through a Categorical Exclusion. Bark feels that Categorical Exclusions should be used for their original intended purpose of conducting “non-controversial” activities such as repairing and replacing infrastructure, not for circumventing public input and avoiding environmental analysis for controversial projects such as salvage logging. **The use of a Categorical Exclusion here to include salvage timber sales is controversial**, as decades of scientific studies have shown that post-fire logging and associated activities degrade otherwise ecologically rich landscapes.²

PROJECT LOCATION AND SETTING

This sale includes three large units, **all of which are now inaccessible** to the public. The unit in Section 30 is inaccessible to the public for any kind of field-checking since it requires a key to locked gates and trespassing onto private land to reach the unit itself. The unit in Section 20 is also currently inaccessible due to locked Forest Service gates. The last unit, in Sections 7 & 18 is in an area off North Fork Road which is currently closed to hiking, making it impossible to field-check. This situation makes it impossible for anyone to form substantive comments that reflect conditions on the ground.

This unit also appears to be within the project area for the 2009 **Airstrip Timber Sale** proposal. It is difficult to tell on the map provided, but several commenters on Airstrip have expressed deep concern about two legacy snags and at least three legacy trees which may be within the newly proposed unit. **Do not pursue post-fire activities which jeopardize these late successional structures.** It would be against the best interest of preserving quality habitat, not to mention the public’s values to endanger these old growth snags & legacy trees.

THE BLM MUST CONSIDER CUMULATIVE IMPACTS WITHIN THE PROJECT AREA

As this project is in an already heavily impacted area in regards to logging and other human-caused disturbance, the BLM must consider the cumulative impacts of adding this CE project to the list of existing and reasonably foreseen logging impacts in areas within and surrounding Sections 7 & 18. When assessing the significance of a project, NEPA requires that an agency consider "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future

² DellaSala, D. 2015. Ecosystem Benefits of Wildfire vs. Post-Fire Logging Impacts. Geos Institute factsheet. <http://www.geosinstitute.org>

actions . . . Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."40 C.F.R. § 1508.7. Significance exists if reasonable to anticipate a cumulatively significant impact in the environment, which cannot be avoided by terming an action temporary or breaking it down into small component parts. 40 C.F.R. § 1508.27(b)(7).

Lands adjacent to Section 7 on east, north, west, and western half of the southern boundary are all recent clearcuts and young plantations. The USFS manages section 17 immediately east of Section 18 and has 2,557 acres of logging projects planned or recently implemented on these second growth plantations, including "No Whisky", "No Gin" and "Rethin" timber sales. The USFS is also simultaneously planning post-fire logging projects in these sections. The remainder of Section 18 is private land managed mostly for timber. The Airstrip timber sale will log up to 290 acres in forests within sections 7 & 18. Most private industrial forest land in this watershed will be intensively managed with regeneration harvests scheduled on commercial economic rotations very 50-60 years. **This situation warrants a strong cumulative impacts analysis in future planning documents, and we are looking forward to understanding more of the potential effects after reading them.**

SALVAGE LOGGING IS CONTROVERSIAL

It is well accepted in scientific literature that salvage logging removes legacy features which help maintain the genetic and species diversity in the areas burned, as well as structural and functional health. In studies of the structures left by high-intensity burns, ecologists have found biodiversity equal to, or surpassing, the biodiversity found in old-growth forest.

Dr. Richard Hutto, one of the nation's top ornithologists, found that: "Besides the growing body of evidence that large, infrequent events are ecologically significant and not out of the range of natural variation, an evolutionary perspective also yields some insight into the 'naturalness' of severely burned forests... The dramatic positive response of so many plant and animal species to severe fire and the absence of such responses to low-severity fire in conifer forests throughout the U.S. West argue strongly against the idea that severe fire is unnatural. The biological uniqueness associated with severe fires could emerge only from a long evolutionary history between a severe-fire environment and the organisms that have become relatively restricted in distribution to such fires. **The retention of those unique qualities associated with severely**

burned forest should, therefore, be of highest importance in management circles”.³

The current science asserts that there are **NO ecological benefits to salvage logging**⁴, and Bark believes that the ecological damages imposed by the salvage component of this project generally outweigh any economic gains. Dr. Hutto writes in the previously cited article, “The ecological cost of salvage logging speaks for itself, and the message is powerful. **I am hard pressed to find any other example in wildlife biology where the effect of a particular land-use activity is as close to 100% negative as the typical post-fire salvage-logging operation tends to be.**”

The impacts of post-fire logging have been thoroughly and consistently documented, and include soil compaction, loss of wildlife habitat (particularly for rare and imperiled species), spread of invasive species, immediate increase in fine, flashy fuels to the forest floor, increases in natural tree seedling mortality, and more.⁵ Saab et al.⁶ found that salvage projects which remove over half the snags in a stand contribute to a significant increase in soil erosion, as well as shortening the longevity of residual snags in an area.

Since the fire, the high to moderate burn severity areas have been converted to an early seral forest habitat; habitat that is well recognized for providing a multitude of beneficial functions and processes, such as complex food webs, nutrient cycling, and high structural complexity including snags. Protection of these pulses of biological activity, and the structures they produce (biological legacies), are recognized by scientists as a top conservation priority⁷.

³ Hutto, R.L. 2006. Toward meaningful snag-management guidelines for postfire salvage logging in North American conifer forests. *Conservation Biology* 20(4): 984-993.

⁴ Noss, R.F., J.F. Franklin, W. Baker, T. Schoennagel, and P.B. Moyle. 2006a. Ecology and Management of Fire-prone Forests of the Western United States. Society for Conservation Biology Scientific Panel on Fire in Western US Forests, Washington, DC.

Noss, R.F., J.F. Franklin, W.L. Baker, T. Schoennagel, and P.B. Moyle. 2006b. Managing fire-prone forests in the western United States. *Frontiers in Ecology and the Environment*, 4(9):481-487.

⁵ DellaSala, D.A. et al. In press. In the aftermath of fires: logging and related activities degraded mixed and high-severity burn areas. In D.A. DellaSala and C.T. Hanson (eds.), *Ecological Importance of Mixed-Severity Fires: Nature's Phoenix*. Elsevier: UK.

⁶ Saab, V. A., Russell, R. E., Rotella, J., Dudley, J. G. Snag longevity in relation to wildfire and postfire salvage logging. 2006. *Forest Ecology and Management* 232 (2006) 179–187.

Saab, V. A., Russell, R. E., Rotella, J., Dudley, J. G. Modeling Nest Survival of Cavity-Nesting Birds in Relation to Postfire Salvage Logging. 2011. *The Journal of Wildlife Management* 75(4):794–804; 2011; DOI: 10.1002/jwmg.111

⁷ Swanson, M. E., et. al. 2010. The forgotten stage of forest succession: early-successional ecosystems on forest sites. *Frontiers in Ecology and Environment*: 10.1890/090157

According to a recent synthesis⁸ of science around post-fire logging, managers should **restrict tree harvest activities to roadside hazard tree removals and should avoid logging within complex early-seral forests**. Frissel et al, in a recent synthesis of aquatic science⁹ concluded further that **“(p)ost-disturbance actions should prioritize road decommissioning or systemic road drainage improvements.”** Along with an added emphasis on protecting biological legacies, **we echo these recommendations** as they apply to areas the Little Chair Salvage Project.

CONCLUSION

As the BLM is considering the optimal method of implementing the Little Chair Salvage Project, please consider that active management is not always the best avenue to achieve forest health. In the comments above, Bark has provided suggestions to improve this project-based on our experience of the project area and the scientific literature pertaining to forest health. We anticipate a thorough review of these comments and look forward to the necessary changes made to both the forthcoming planning documents and the project itself.

Thank you,



Michael Krochta

Forest Watch Coordinator, Bark

⁸ DellaSala, D. 2015. Ecosystem Benefits of Wildfire vs. Post-Fire Logging Impacts. Geos Institute factsheet. <http://www.geosinstitute.org>

⁹ Frissell, Christopher A., R. J. Baker, D. DellaSala, R. M. Hughes, J.R. Karr, D. A. McCullough, R. K. Nawa, J. Rhodes, M.C. Scurlock, R. C. Wissmar. 2014. Conservation of Aquatic and Fishery Resources in the Pacific Northwest: Implications of New Science for the Aquatic Conservation Strategy of the Northwest Forest Plan . Coast Range Association, Corvallis, OR. 44 pp. (<http://coastrange.org/documents/ACS-Finalreport-44pp-0808.pdf>)