January 23, 2012

Ms. Kim Titus  
District Ranger  
Hood River Ranger District  
6780 Highway 35  
Mt. Hood / Parkdale, OR  97041

Re: Mill Creek

Dear Ms. Titus,

I am writing to comment on the proposed Mill Creek project on behalf of Bark, the Sierra Club and Cascadia Forest Alliance.

The scoping letter mentions that there is an A7 Special Old-Growth area in the project area, yet there is no further mention of the plan for that area. Based on our review of the Mt. Hood Land and Resource Management Plan (MHLRMP) maps, it appears as though the A7 area is part of the Improvement Cut and Underburn prescription. If this is the case, then we ask you to refer to the MHLRMP standards and guidelines at A7-014 where it states that regulated timber harvest shall be prohibited within A7 areas. The statements made in regard to this A7 area during the field trip you conducted seem to conflict with the prescription detailed in the scoping letter, so we raise this issue as a precaution.

We are also concerned about trail 451, which cuts right through the Mill Creek area. The trail has been logged over in the past, yet is now a functioning trail. The Mill Creek scoping letter fails to even mention this trail or the effects to it, however it appears as though several commercial thin units would log right over it. We find this disregard for non-motorized recreation discouraging, when at the same time efforts are being made to limit and control the recreation in Mt. Hood N.F. wilderness areas. Without the expansion of non-motorized recreation opportunities outside of wilderness areas, recreationists will be increasingly forced into the islands of wilderness for their recreation needs. We must not only maintain non-wilderness recreation opportunities, but must expand them. We ask that you do not log over trail 451. We also ask that you consider any roads to trails possibilities within the Mill Creek area, especially within the A7 Special old Growth area - as directed by the MHLRMP.
The plan for the meadows and scarps sounds very good and we support it. We are concerned with the grazing allotment in the area, though. What steps will be taken to ensure that the work done on the meadows and scarps will not be undermined by continued grazing in the area? Have you considered ceasing the grazing in the area? It seems like a potential waste of taxpayer money to restore the meadows and scarps and then allow further grazing in those areas.

The roads plan is also a good start towards solving the roads problems in the area. We would like you to consider not just closing the roads, but obliterating as many as possible. The scoping letter notes that part of the road problem is related to higher peak stream flows. Closing the roads will not affect this problem, whereas obliterating the roads would. If roads cannot be obliterated, we ask that they be closed using an extended “Entrance Management” method, where the portion of the road within the line of sight from the closure point is obliterated (not just the first 100 feet). Also, there are several roads entering the Long Prairie riparian area that do not appear to be scheduled for closure: 1700-650 and the road opposite the start of 1711 at its junction with 1710. It would seem of particular importance to close and obliterate these two roads.

The Mill Creek watershed analysis recommends that road 1700-662 be closed with berms or something other than gates, yet the plan calls for a gate closure on this road. The scoping letter recognizes animal harassment and poaching as a problem on 662. Gates have proved ineffective on this road. Why are you not following the Watershed Analysis recommendation?

Given the extensive road problems in the Mill Creek area, we were disappointed to see that you plan to build even more roads as part of this plan. As you know, a road is not a short-term impact. Even once they are closed or obliterated they continue to attract motor vehicles and affect water drainage and sedimentation. Since the primary goal of this project is forest health, there should be no new road building or road “re-opening.”.

Since the primary objective of this project is forest health, we ask you to add a forest health with no commercial logging alternative to the Environmental Assessment. One possible way this could work is to hire crews to work on forest health projects, such as pruning mistletoe from trees. This highly labor intensive work could provide the economic support needed in the local communities, plus it would be more effective for addressing health issues such as mistletoe. With the mechanization of the logging and milling processes, employment in the logging industry has dropped dramatically in the last decade, yet this pure forest health approach would actually increase employment. Additionally, for many forest health issues - such as mistletoe - logging usually only exacerbates the problem. While we have disagreed on forest management issues in the past, this is one plan that I think we could develop into a solution for all interested parties.

We feel the Douglas Fir Dwarf Mistletoe health concern lends itself particularly well to an alternate solution other than logging because of its propensity to thrive after logging. One need only walk the previously logged areas around Mill Creek to see that the past logging has not stopped the mistletoe infection. Logging only opens up the light, giving mistletoe more energy to grow. Even after clearcutting mistletoe is known to blow in on the regrowth from adjoining trees. Sources we have consulted state that pruning is the only effective way to combat mistletoe. While at first pruning national forests may seem an impossibly large task, if one is truly trying to assist local economies
then it raises all types of possibilities.

If mistletoe areas are to be logged, will only the infected trees be removed? If other trees will also be removed, how does that address forest health? Have the positive benefits of mistletoe, such as being attractive nesting sites for spotted owl and red tree voles, been considered?

We are also concerned about regenerating areas due to laminated root rot. Since laminated root rot can live for up to 50 years in stumps, it is unclear how regenerating these areas will stop it. We ask that you consider these areas for wildlife habitat, not timber harvest.

The Mill Creek area is very windy. In some areas the trees even exhibit definite wind-blown attributes. Blowdown is also extensive. All previously cut areas show signs of blowdown along their edges. How will further logging avoid creating even more blowdown? Also, blowdown within previous cut areas is obvious. How does this attrition of trees left after cutting play into thinning plans.

To what extent have threatened, endangered, survey & manage and other indicator species been surveyed for in the Mill Creek area? One of our concerns with species protection is that surveys often focus on potential habitat rather than on actual numbers and locations of species. For instance, with Spotted Owls, we often see the effects discussed theoretically in numbers of potential acres of habitat. What we don’t see is a discussion of the actual owls being effected and how their current habitat will be altered by the proposed logging. This is important because we continue to see a decline in many old-growth related species such as Spotted Owl. Assumptions have been made that if there is enough suitable habitat, the species will survive. Unfortunately, the species don’t have copies of the NWFP maps. They don’t know where the LSRs are. We must take more efforts to protect the habitat where they are currently located. We have also noted snowshoe hare tracks in the area and would like to know whether lynx surveys have been conducted.

Because so many timber sale plans make claims about future benefits, we ask that you include strict post-sale monitoring with the Mill Creek plan. This might include monitoring of BMPs to ensure their effectiveness, it might include monitoring of water quality to determine planned effects versus actual effects, and it might include surveys for at-risk species. Of course, post-sale monitoring requires pre-sale baselines, so we also ask that you do pre-sale monitoring to determine appropriate baseline figures.

As for the C1 timber emphasis designation referred to in the scoping letter, I will repeat what I have stated to you before: since the NWFP takes precedence over any less restrictive management directives and since the NWFP’s Matrix designation is more restrictive than the MHLRMP’s C1 designation, C1 is no longer an appropriate management designation. The NWFP’s Matrix designation does allow commercial timber harvest, but another goal of Matrix is to “perform an important role in maintaining biodiversity.” To what extent are the proposed Mill Creek actions maintaining biological biodiversity? If the primary goal for this project is forest health, will all of the actions be beneficial to forest health? Some actions, such as new road building, sound more harmful than any supposed benefit.

We also ask that you consider no late-seral or old-growth logging in the Mill Creek plan. It is
difficult to conceive of how the logging of ancient trees would achieve the stated goals of the timber sale. I have attached a copy of letter drafted by Dave Perry and other scientists, backing the protection of all late-seral and old growth forests. Along with their letter is a bibliography of citations supporting their position. Not only do the scientists support our position, but recent polls have shown that 75% of the public back an end to old-growth logging. If you feel you cannot drop the late-seral and old-growth portions of the Mill Creek sale, we would like you to address the issue of late-seral and old-growth logging in the EA.

Is any logging planned within the B2 Scenic Viewshed areas? If any logging is planned, we refer you to the standards and guidelines for B2 areas in the MHLRMP. Some recent Mt. Hood sales have disregarded these standards and guidelines.

In ground-truthing the Mill Creek area, we have seen that the areas planned for Overstory Removal already have many open canopy areas and are quite mosaic in their structure. As noted above, since mistletoe thrives with more light we question whether the further removal of the canopy will have the intended effect.

Similarly, much of the B10 Deer and Elk winter range is already quite fragmented and mosaic. We question how the thermal and optimal cover will be maintained by the proposed action of thinning.

The description of the Improvement Cut prescription is not clear. It states “remove the smaller trees adjacent to the large trees and thin the remaining areas.” Does this mean that all the trees will be thinned after removing the smaller trees adjacent to large trees, or that only the smaller trees will be thinned after removing those close to large trees?

We have noticed in our ground-truthing around the Mill Creek area that many of the old clearcuts have not regenerated well. What steps will be taken to ensure that logged areas regenerate within 5 years? This is of particular concern on the steep slopes leading down to the North Fork Mill Creek. It is difficult to imagine these areas regenerating well after an industrial cut.

We are continually distressed to see even spaced tree farms in and around Mt. Hood N.F. where forests once stood. We are concerned about the commercial and pre-commercial thinning proposals which include even tree spacing. Throughout the area are examples of trees growing close together for hundreds of years, and thriving. The only possible justification for even spaced management is accelerating growth for timber harvest. We ask that any thinnings be undertaken only if they enhance biodiversity, not so they enhance future timber harvest.

Thank you for the opportunity to comment on the Mill Creek plan. We hope that you incorporate our comments into the Mill Creek planning process.

Sincerely,

Gregory J. Dyson,
Bark
Attachment: Scientists Old-Growth Statement

Also joining in these comments are:

- The Sierra Club, Carol Porto, 2950 SE Stark, Suite 110, Portland, OR 97214
- Cascadia Forest Alliance, Sarah Wald, PO Box 4946, Portland, OR 97208