



## **BARK**

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Cascades Field Manager  
BLM – Salem District  
1717 Fabry Road SE  
Salem, OR 97036

Submitted by email to [cindy\\_enstrom@blm.gov](mailto:cindy_enstrom@blm.gov)

### **RE: Comments on Missouri Ridge Decision Notice Comments (#OR080-04-20)**

Dear Ms. Enstrom,

Bark would like to express our concerns with the Missouri Ridge Thinning project. This project would thin approximately 70 year old stands on 139 acres. The project entails logging in General Forest Management Area and Riparian Reserves. The project will reduce the canopy to 40% in the Matrix LUA and reduce the canopy to 50% within 14 acres of Riparian Reserves.

Bark has nearly 5,000 supporters who enjoy public land forests surrounding Mt. Hood for a wide range of uses including, but not limited to: clean drinking water, hiking, nature study, non-timber forest product collection, spiritual renewal, and recreation. We submit these concerns on behalf of our supporters.

At Bark we visit each sale in Mount Hood National Forest and the surrounding BLM lands. We strive to get as much on the ground information as we can for each project. Please consider the following when proceeding with this project and creating projects in the future.

#### **Road Building**

We are concerned that 1.2 miles of new road will be constructed that were not analyzed in the EA. The BLM notes how they were unable to get the right-of-way permits for the shorter roads listed in the EA and will need to instead create significant new road miles. This action, taken without analysis, **necessitates a supplemental EA** which analyzes the proposed new road and discusses alternatives.

These new road miles are of particular concern since it goes over an intermittent stream in between Units 2 and 3. The DN notes that “because the terrain is flat at the crossing the likelihood for sediment entering the stream is low.” (DN p. 4) Yet nowhere does the DN go on to elaborate what the environmental costs are. An intermittent stream still flows at certain times of the year, and roads are known to increase the overall stream mileage, increase sediment load to the stream, increase peak flow, and reduce base flows. These issues should be discussed in a supplemental EA.

It appears that here, much like in the proposed Airstrip Timber Sale; the BLM is placing the road where it is convenient instead of where it ecologically makes sense. The proposed road in Missouri Ridge, after crossing the stream, travels northwest right along the top of the ridge and the 30% slope above the creek in between the units. Similarly in Airstrip the road goes right along the edge of the Lee Dee plateau directly above the Clackamas River. We are concerned that new roads right along the top of steep slopes will release sediment into the streams and increase landslide risk.

In both Missouri Ridge and Airstrip, the right-of-way will be placed along the edge of very steep slopes - a 20% to 30% gradient. It seems that the road needs to be placed here to facilitate skyline logging. As the road will run perpendicular to these steep slopes the road will need to cut into the hillside along the top of the upslope and be filled in along the downslope. We are concerned that these roads are at risk of cut and fill slope failures. This is especially troubling since these roads are both above streams. And in the case of Airstrip the road is in landslide risk areas.

After visiting some of the Missouri Ridge units we saw many signs of OHV use on old skid trails as well including, for example, where the proposed road comes off Wyland road veering southwest into unit 3. The DN notes that the area will have a gate at the base of the road. As we have seen in many areas, like in the Airstrip Timber Sale, OHVs go right around these passive closures and utilize the area, causing significant resource damage. Further, this gate does nothing to mitigate the effects of fragmentation to the landscape, sediment release from the roadway, and the compaction to the soil.

We are curious if the BLM has a long term need for the road? Might it not be better to rip the road, at least the first segment of the road anyways, to alleviate many of our concerns? Please consider these issues in the aforementioned supplemental EA.

### **1.) Logging in Riparian Reserves**

The proposal allows for 60-100 foot stream protection zones on streams within units. We are pleased to see that the BLM will be retaining the larger cedars and hardwoods as outlined in the EA. But we do have concerns about logging along these steep slopes in and above the riparian reserves. These streams are all headwaters for Rock Creek and we are concerned about damaging impacts to the watershed.

Logging in riparian reserves is allowed only if it is “needed” to attain ACS objectives. In other words, if ACS objectives would someday be met without logging then logging is prohibited. Accelerating attainment of ACS objectives is not a valid reason to log in riparian reserves. Generally the inner half of riparian reserves does not need thinning because those areas are naturally more diverse, more productive, and more subject to disturbances such as floods compared to the uplands

The DN notes that riparian thinning is beneficial for ACS objectives because it will “create stands that will exhibit attributes typically associated with stands of a more advanced age.” This is simply not supported by any science. Thinning the inner half of riparian reserves will capture mortality and delay attainment of ACS objectives for large wood thus violating the RMP.

Also, when the objective of riparian thinning is to develop structures suitable for in-stream habitat structures, there is a trade-off between the size of individual pieces and the absolute volume of woody input. Contrary to common assumptions, thinning is not a zero sum game, especially not in the years immediately following thinning. The wood that is captured and removed does not regrow for decades, and if a disturbance event comes along during that time, the absolute volume of wood recruited to streams WILL be adversely affected.

We request that the agency provide better analysis of the short term losses to riparian habitat, so that the public can better understand the risks involved in these potential long-term gains.

## **2.) Skyline logging**

Skyline logging is the process of using a winching machine and a system of heavy wire rope to remove timber from the forest. This system is best suited to steep slopes and soft soils that restrict a ground based approach. In order for this type of logging to be cost effective there needs to be sufficient volume of high-value timber available. Since there are only 12 acres of 70 year old trees proposed for skyline logging we question whether the small monetary gain is worth the ecological cost.

It is noted in the DN that the skyline logging will be done with one end suspension (DN 17). Logging in this manner drags one end of the log up the hill creating a gash into the landscape. With sufficient rains these skyline corridors can create channels for water to leave the area. As the skyline logging is all proposed along the headwaters of this creek we are concerned about increased sediment and runoff entering this stream.

Also skyline logging requires that the road be placed right at the top of the 30% slope above the creek that runs between units 2 and 3. If skyline logging, which is already such a small component of the proposal, was not included then the road could be more centrally located. This would avoid impacts to streams such as increased sediment, peak flows, and a potential landslide risk. It seems to us that the best course of action would be to remove the 12 acres of skyline logging from the proposal.

### **3.) Protect Legacy features**

In younger stands of trees the BLM continually puts forth the notion that logging restores the forest. While thinning may expedite the growth of some trees what we are losing is the decay features that are so vital for forest health. Thinning is said to “capture” mortality by removing the very trees that would be crowded out, die, and function as snags and downed woody debris. Carey et al. (1999) found that coarse woody debris amounts declined significantly as a result of variable density thinning, especially the higher decay classes, despite the intent of the treatment to leave all existing debris in place.”

Managing for decadence in young stands is not a trivial issue because among the many other valuable attributes of dead wood, it is strongly associated with healthy populations of many small animals’ species that in turn help support populations of at-risk predators such as spotted owls, goshawk, fisher, marten, etc. In fact, the snag dynamics white paper on the Dec AID website indicates that timber harvest typically results in the loss of a majority of the standing snags (62% of snags within a variety of timber harvest areas were cut down. Please see the link below for more information.

<http://www.fs.fed.us/r6/nr/wildlife/decadid/pages/Snag-Dynamics.html>

While there is not a lot of available habitat, we heard a Pileated Woodpecker in Unit 2 during a visit on February 5<sup>th</sup>, 2001. These keystone species are important because they create habitat for so many species. The BLM needs to do whatever it can to maintain habitat for them and all the species dependent on the cavities they create. We propose that the agency increase snags by inoculating trees with endemic fungus to begin the process of snag creation.

We encourage the agency to leave any legacy features remaining found within the planning area. Often planning documents say that contractors will leave snags standing, but what we continually find are snags removed that pose a safety risk. While OSHA regulations may be the cause of the felled snags, the BLM could better address this by buffering these important landscape features. So much of this planning area is largely deficient in snags, so all remaining snags need to be protected in this and other sales, including the Airstrip Timber Sale.

Thanks you for your time and consideration of our concerns. We look forward to working with the agency in future endeavors.

Sincerely,

Gradey Proctor  
Forest Watch Coordinator