

BARK ALERT - Mt. Hood Timber Sales

Mon, Jan 23, 2012

ORCHARD Project Area

What: EA comments - specific comments on the Environmental Assessment

When: Comments are due Wednesday, **September 1, 1999**

District/Forest: Clackamas District, Mt. Hood National Forest

Legal description: T5S, R5E, sections 4, 5 & 8

General area: The units are between the South Fork Clackamas River and Memaloose Creek, at the north end of road 4500-220, surrounded on two sides by an LSR.

Watershed: South Fork Clackamas River

Size: 250 acres

Volume: 2 million board feet

Riparian reserves: 16 acres of thinning in riparian reserves

LSR entry: 200 feet of road building in an LSR

Roads: 2.2 miles of road construction

Northwest Forest Plan land allocations: LSR, Matrix and Riparian Reserves

District contact: Jim Rice, (503) 630-6861

Send comments to: Christine Pazzula, Acting District Ranger, Clackamas River Ranger District, 595 NW Industrial Way, Estacada, OR 97023

Proposed actions:

1. 230 acres of thinning within matrix
2. 2.2 miles of road construction
3. 200 feet of road construction in an LSR
4. 16 acres of thinning within Riparian Reserves
5. 4 acres of regeneration within matrix
6. Create deer forage by obliterating and revegetating road 4500-242

A few thoughts from Bark:

1. LSR road-building: there should be no road-building in an LSR for any purpose, let alone as a means of access to logging non-LSR land. This undermines the special designation of LSR s, and their intended purpose in the Northwest Forest Plan: "to protect and enhance conditions of late-successional and old-growth forest ecosystems. which serve as habitat for late-successional and old-growth forest related species including the northern spotted owl."

2. 16 acres of thinning in Riparian Reserves: what part of the word "reserves" doesn't the [De]Forest Service understand? The Forest Plan allows Riparian Reserve logging only when there is a demonstrated "need." The only justification given for this logging is that the trees will grow bigger more slowly if there is no logging, thus slowing

down the speed at which the riparian areas will achieve old-growth conditions. In other words, the Forest Service is claiming that this logging will actually help the Riparian Areas. I think we have a language barrier here. To quote the EA, "Thinning in Riparian Reserves may pose a short-term risk to water quality and fisheries habitat if sediment is delivery (*sic*) to the tributaries of Memaloose Creek during project implementation."

3. 2.2 miles of road construction: the [De]Forest Service calls them "temporary roads." Let's do some math - let's say the roads are built in year one of the sale. Then the logging lasts 2-3 years, which is typical. So in year 3 the road is obliterated. Then it takes about 10 years for an obliterated road to no longer have a negative effect on the watershed (by the Forest Service's own estimates), so by then we are in year 13. The so-called temporary road is, in fact, effecting the watershed for a total of 13 years. 13 years! This is not so temporary after all. And ponder this thought: the Clackamas District alone already has over 1300 miles of open roads.

4. The surrounding LSR: LSR stands for Late Successional Reserve, but much of the so-called LSR in this area was logged before the Forest Plan was put into effect. Until this LSR recovers, there should be no logging in the immediate area. We cannot allow the logging of lands immediately adjacent to LSRs when the LSRs are not actually late-successional.

5. Alternative C: in addition to the no action alternative, the Forest Service has proposed Alternative C, which includes no road construction and lots of helicopter logging. Alternative C still includes the riparian reserve thinning, but it would also be done by helicopter logging, thus reducing the impacts.

This alert was prepared by:
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