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11/30/2015

Casey Gatz
Barlow Ranger District
780 Court Street
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RE: Rocky Project scoping comments

To Casey Gatz,

Bark's mission is to bring about a transformation of public lands on and around Mt. Hood National Forest 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 lands surrounding Mt. Hood, including the areas proposed for logging in this project, 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 comments on behalf of our supporters.

The "Rocky Restoration Project" would include 5,437 acres of "Plantation Thinning", 1,740 acres of "Oak Restoration Thinning" and 1,323 acres of "Underburning" totaling in 8,500 acres of active management. To the best of Bark's recollection, this is the largest project that Barlow has proposed since we have been monitoring and engaging with the district. Knowing this, it is critical that Forest Service (FS) staff take careful steps to foster public engagement by engaging with and responding to public comments as meaningful involvement with knowledgeable, concerned and engaged users of the forest often outweighs the importance of streamlining commercially-driven NEPA projects. Bark requests detailed, direct responses to public input, including changing the

¹ 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.

project further to address input and concerns, as this is the only way to maintain meaningful involvement in the decision making process for our public lands.

Field-checking this project has been hampered by the timing of the release of the scoping notice. The western “cow-i-gator” section of the Rocky project is entirely out of reach to the public at this time since it is under snow. As the scoping period is when the public is asked to participate in the NEPA process, the obligation is on the Forest Service to ensure that this happens when access to the sale area is possible. In the past we have requested that the FS only move on these proposals when the public can fully engage in the NEPA process. We now request that any site specific comments be considered outside of the official scoping period since the area is presently inaccessible. We will send these additional comments to the FS in subsequent documents.

ROCKY IS NOT A COLLABORATIVE PROJECT

The Wasco County Forest Collaborative Group, of which Bark is a member of the Steering Committee, has within its charter an predominant objective to “(r)estore natural processes and functions within a biophysical setting’s natural range of variability” within the Rocky project area. When Bark joined the newly forming Wasco Collaborative group we believed, as did many others, that one of the key purposes of the group's existence was to collaboratively plan the Rocky Project. To that end, we sought a grant from OWEB to assist in finding common ground and mutual understanding among the stakeholders, from which we could help the MHNf craft the Purpose and Need and Proposed Action for the Rocky Project.

It appears, however, that the MHNf was working under a different assumption about both the purpose of the group and the time needed for the collaborative process to unfold. We think it is safe to say that all parties can agree that the Rocky Project, as proposed, has not been developed with a collaborative group, and that in moving forward the role of the group will be to give suggestions for how the Forest Service may modify its action, but is not a part of creating the vision and substance of the action.

This is not a surprise, given Bark's disappointing experience in collaborative groups on the MHNf over the years. We have often found the MHNf to be quite dismissive of the process and product of collaboratives - whether by skipping the process altogether, as in this case, or failing to incorporate the collaborative's recommendations into a project, as was the case with the Stew Crew's recommendations for the Red Hill timber sale in the Hood River District (see attached letter).

As was noted in the meeting minutes and a follow-up email to Mr. Sam, if the MHNH is seeking grant funding for the Rocky Project that requires the project be collaboratively designed, the MHNH cannot honestly represent that it was. This may put you in a bind when it comes to funding the Rocky Project.

Bark reiterates its request that the MHNH withdraw this scoping notice to give the Wasco Collaborative time to work collectively on a Purpose and Need and Proposed Action for the Rocky Project.

ACHIEVING “HISTORIC CONDITIONS” WITHIN THE ROCKY PROJECT AREA

One of the objectives of the Rocky project is to “restore and enhance stands to more historical conditions”. According to the scoping letter, “existing plantations do not have the mix of tree species that were present historically”, and so the FS would like to “promote and develop more resilient ponderosa pine/oak habitats to more historic conditions”. What reference point is the FS using to define historic stand conditions in Rocky? If the agency’s overarching goal is to re-create the past, what resources is the FS using to piece together what this forest looked like over 100 years ago? Do these historic stand mixes make sense in terms of the effects climate change may have on the area? Would the FS achieve more flexibility later if they chose to favor a more diverse mix of tree species than what was perhaps present historically?

In a historic document titled “Forest Conditions in the Cascade Range Forest Reserve, Oregon. 1903” (sent via email to Casey Gatz and Whitney Olsker, 11/23/15), the Rocky area is partially described. According to this document, the western part of the project area was found to contain much more “Red fir” (Douglas fir) than “Yellow pine” (Ponderosa pine). But just to the east, still within the Rocky area, this appeared to flip – with more pine than Douglas fir. Fascinating excerpts of this document are pasted below:

From “Forest Conditions in the Cascade Range Forest Reserve, Oregon. 1903”

TOWNSHIP 4 SOUTH, RANGE 10 EAST

This township has a southern and eastern drainage through the White River, Boulder Creek, and Gate Creek watersheds. The canyons of White River and Boulder Creek are deep and rough, but the remaining sections have a comparatively even surface. The timber is spotted, and peculiar intermingling of timber occurs. Yellow pine, tamarack, noble fir, and Patton hemlock grow side by side as though native to the same zone. In the basins of the small streams flowing into Boulder Creek from the west the timber is poor and fires have burned through much of it. It is mostly Mertens hemlock and red fir, with patches of red cedar along the streams.

Stand of timber in T. 4 S., R. 10 E.

	M feet B. M.
Total.....	291, 177
Yellow pine	48, 569
White pine	1, 150
Lodgepole pine	2, 689
White fir	26, 894
Noble fir	18, 196
Lovely fir	8, 374
Red fir	137, 495
Mertens hemlock	10, 603
Patton hemlock	11, 589
Red cedar	7, 754
Engelmann spruce	7, 525
Tamarack	10, 253
Cottonwood	86

TOWNSHIP 4 SOUTH, RANGE 11 EAST.

This township is one of those added to the reserve by the proclamation of July 1, 1901. It lies mainly in the yellow-pine belt, of which species most of the timber is comprised.

Some of the land may be considered fairly good for agricultural purposes, but most of it is very rocky. Along the eastern side of the township the timber is of little value for lumber, and some narrow timberless tracts, aggregating about 200 acres, penetrate a short distance into the reserve. These are rocky depressions, upon which water stands in the spring and prevents tree growth. These sections are underlaid with hardpan, which, on the ridges, is barely covered, and much washing of the soil has taken place. This has caused the numerous ridges to be almost barren of soil, while the narrow canyon bottoms contain small tracts of fertile land deposited by this washing. In all places where the slope of this hardpan does not permit free drainage the ground during the winter and spring becomes so soft that horses and cattle are frequently lost by miring.

Stand of timber species in T. 4 S., R. 11 E.

	M feet B. M.
Total.....	154,053
Yellow pine.....	103,662
White pine.....	25
White fir.....	8,180
Noble fir.....	13
Red fir.....	40,437
Mertens hemlock.....	463
Red cedar.....	162
Engelmann spruce.....	27
Tamarack.....	726
Incense cedar.....	340
Cottonwood.....	18

In addition, the Rocky scoping letter states that the majority of the project area has been mapped as Condition Class 2 or 3, indicating they have missed one or more natural fire events and now contain unnaturally high fuels. Where is this map? What natural fire regimes exist/existed in this area? If fire frequencies have truly departed from historical rates by multiple return intervals (as is implied in the scoping letter), this forest would have to contain a frequency of either I or IIIA [as described in this document](#). Even so, it is difficult to imagine this area missing multiple *large* fires, as the Rocky Burn occurred 42 years ago. In all likelihood, it seems as if much of this area could reflect more of a [Condition Class 1](#), where “Fire frequencies have departed from historical frequencies (either increased or decreased) by no more than one return interval.” According to the FS, “Where appropriate, these areas can be maintained within the historical fire regime by treatments such as fire use.” Please include an explanation in the EA of how the Rocky project area specifically reflects either of these condition classes.

ROAD-RELATED WORK TO BE COMPLETED WITH THE ROCKY PROJECT

In every communication Bark has had with Forest Service employees and the members of the Wasco Collaborative about the Rocky Project, we have emphasized the need to include road decommissioning as a part of the project proposal. Many other members of the Collaborative Group also shared this desire for the project.

We were quite disappointed that the scoping notice did not include any mention of road decommissioning in either the Purpose & Need or the project design. Given the broad support for reducing the road network in the project area by members of the Collaborative Group, this omission adds to Bark's conviction

that the Forest Service planned this sale exclusive of input from the Collaborative as a whole, or its individual members.

However, Bark is not only concerned about this omission at the process level, as the Forest Service has long recognized the need to right-size the road network in the White River Watershed, and this project is an appropriate place to do so.

According to the 2003 Mt. Hood National Forest (MHNF) Roads Analysis, the White River watershed contained 628 miles of roads - almost double the amount of roads of any other Key Watershed in the Forest. The road density is among the highest in MHNF, with an average density over 3.5 m/m². As the Northwest Forest Plan instructs, “the amount of existing system and non-system roads within Key Watersheds should be reduced through decommissioning of roads.” *NFP at B-19*.

In October, 2010, former Barlow District Ranger Mike Hernandez, along with Hood River Ranger Daina Bambe, initiated scoping for the Increment 3 Road Decommissioning Project. It included the proposal to decommission approximately 200 miles of barely-used roads on the Barlow and Hood River Ranger Districts. Several roads were proposed for conversion into non-motorized recreation trails, and one road into a snowmobile trail. An additional 35 miles were proposed to be closed to public use. When this project was completed, approximately one third of the roads in the area would be decommissioned. While this was still below the Mt. Hood National Forest’s goal for its minimum road system (removing 49%, as per Mt. Hood’s 1999 Access and Travel Management Plan), it was a step in the right direction for road decommissioning in MHNF and Bark supported the project moving forward.

In the initial Increment 3 scoping notice, MHNF gave the following three needs for the action:

- 1) There are miles of roads on the Forest that have not been maintained or repaired. If the roads are not maintained or decommissioned in the near future, there is an increased risk of surface erosion, gulying and landslides. Such potential risks may result in increased sediment delivery to streams and reservoirs, thereby affecting water quality and aquatic habitat.
- 2) High open road densities are associated with habitat fragmentation and wildlife harassment. Decommissioning roads could allow for wildlife species to utilize more contiguous habitats and promote healthier wildlife populations.

3) Roads serve as potential conduits for non-native plants. Managing the spread of invasive species is important for maintaining healthy native ecosystems. If certain roads are not decommissioned, there is the continued threat for invasive plants to spread and displace native plants.

In 2014, when Bark heard that MHNH was re-starting the Increment 3 Road Decommissioning project after a few years delay, we were excited for the Forest Service to be proactively engaging in road decommissioning again. Upon receiving the new scoping letter, our excitement quickly turned to incredulity. Instead of 200 miles of road decommissioning, the newly proposed Increment 3 includes less than ten miles. To the best of Bark's knowledge, even that miniscule amount of road decommissioning has been delayed.

MHNH's failure to follow through with its plans for robust road decommissioning have many adverse impacts to soil, water and wildlife. In the past, many logging roads were designed for temporary use, and often they were not well-planned or well-constructed. Roads were placed in floodplains, along steep slopes, and through important wildlife habitat.

Once logging was complete, the roads were typically left on the landscape. When roads are not maintained or under-maintained, culverts become clogged with debris, landslides occur, bridges weaken, and roads wash out. Large amounts of sediment pours into streams. Hazards, such as washouts, slumps, and gullies, pose serious safety risks to those driving on forest roads, at times even making access impossible. They also transform passenger vehicle roads into high clearance roads, precluding access for many visitors trying to reach trailheads, campgrounds, and other recreational destinations.

Excessive sedimentation into streams interferes with fish spawning, rearing, and survival. This can have significant monetary cost when important recreational or commercial fish such as salmon and trout are affected. Roads also affect wildlife. Terrestrial wildlife is also greatly influenced by road density. Roads impact wildlife in a variety of ways including direct mortality from vehicle collisions; increased poaching, over-hunting, and over-trapping facilitated by access; reduced numbers of snags and down logs; increased negative edge

effects; facilitated or hindered movement depending on species; and chronic negative interactions with humans².

In the Rocky Project Area specifically, Gate Creek, which runs through the Rocky project area, has a particularly high ranking of 6th field watersheds with roads near streams. *2003 Roads Analysis at 23*. Because failing roads are such a persistent source of sediment to streams and rivers, this watershed should be the focus of ambitious road decommissioning. In addition, the White River Watershed Analysis (WRWA), in its recommendations for restoration projects, acknowledges that the Mt. Hood Forest Plan (LRMP) requires MHNH to reduce open road densities to 2.5 miles per square mile in big game summer range, 2 miles per square mile in inventoried winter range, 1.5 miles per square mile in A1 (White River National Wild and Scenic River), B2 (Scenic Viewshed) and B10 (Deer and Elk Winter Range) land allocations. *WRWA at 7-1*. It goes on to recommend that MHNH evaluate all native surface roads for obliteration, closure or erosion control, and sets out the priority watersheds. It also instructs MHNH to evaluate all aggregate surface roads to assess erosion control needs.

As far as Bark can tell from the Rocky Scoping Notice, the MHNH has chosen not to address road-related issues in what it touts as an "integrated resource restoration" project. By failing to account for the impacts of roads in this key watershed, or planning to reduce road density, MHNH is missing a large part of the needed restoration in the Rocky Planning Area.

In previous comments we have cited a report titled *Conservation of Aquatic and Fishery Resources in the Pacific Northwest: Implications of New Science for the Aquatic Conservation Strategy of the Northwest Forest Plan*.³ The report's authors and science panel members not only represent the best available science, but have developed much of the relevant science over the course of their professional careers. The report is the most complete synthesis of aquatic science related to the Northwest Forest Plan (NFP) since the development of the Plan in 1993. The

² Wisdom, M.J., R.S. Holthausen, B.C. Wales, C.D. Hargis, V.A. Saab, D.C. Lee, W.J. Hann, T.D. Rich, M.M. Rowland, W.J. Murphy, and M.R. Eames. 2000. Source habitats for terrestrial vertebrates of focus in the interior Columbia basin: broad-scale trends and management implications. Volume 1 . Overview. Gen. Tech. Rep. PNW-GTR-485. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.

³ 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>)

Rocky proposed action *as written so far* is in conflict with the key findings of the Coast Range Association's ACS report.

In the aforementioned ACS report, the issue of roads is addressed, and recommendations from the report include:

- “Prohibit the construction of new permanent and “temporary” roads, except in limited instances where construction of a short segment of new road is coupled with and necessary for the decommissioning of longer and more damaging segments of existing road.”
- “Allow no net increase in road density in any watershed.”
- “Require each proposed forestry and other development project to meet a target of incremental reduction of the road system in all watersheds affected by the project.”
- “(R)oads for which there are not adequate funds for maintenance and upkeep should be decommissioned.”

Bark echoes these recommendations for most projects on federal lands we monitor. **We ask the FS to consider these recommendations as they develop alternatives for the Rocky project.**

In moving forward with the Project, Bark requests that MHNf assess all the roads included in the original Increment 3 scoping notice for potential decommissioning:

- 4800-011, 4800-014, 4800-130
- 4810-014, 4810-015, 4810-017, 4810-140, 4810-141, 4810-160, 4810-161, 4810-190, 4810-191, 4810-200
- 4811-011, 4811-180, 4811-190
- 4813-120
- 4820-012, 4820-014, 4820-025, 4820-026, 4820-120, 4820-132

EXISTING ROAD DENSITY & HEAVY THINNING CONTRADICT ROCKY'S PURPOSE AND NEED

A key purpose of the Rocky Project is to decrease the risk of high-intensity fire in the project area. This purpose would be better achieved if the project included road closure and road decommissioning. It is well established that roadless areas generally have lower potential for high-intensity fires than roaded areas in

large part because they are less prone to human caused ignitions^{4 5 6}. Wildland fire ignition is almost twice as likely to occur in a roaded area as in a roadless area, and the median size of large fires on national forests is greater outside of roadless areas.

In his study of the effects of roads on wildfires in national forests in California, Robert F. Johnson concluded that over 52 percent of human-caused fires occurred within 33 feet of a road edge.⁷ According to the 2000 USDA report cited above, human-ignited wildfire is almost 5 times more likely to occur in a roaded area than in a roadless area. Couple this statistic with the fact that only 2% of acres burned in Mt. Hood NF during 2014 were naturally caused⁸, and one cannot deny the amplifying effect road density can have on fire starts. Bark finds it tragically ironic that the original Rocky burn of 1973 was road & logging-related (a rubber tire skidder with a brake fire).

This is all disconcerting because according to the Forest Service, more than 90 percent of wildland fires are the result of human activity, and ignitions themselves are almost twice as likely to occur in roaded areas as they are in roadless areas.⁹ Although it can be argued that roads improve access for fire suppression, this benefit is more than offset by much lower probabilities of fire starts in roadless areas.

Scientists suggest that, in the face of projected road developments, the potential exists for important changes to the regional fire regime. The Forest Service itself has said: “A potential factor in the increase in fire size and severity may be related to increased incidence of human-caused ignition. Human access is likely to be increased by roads, a factor that will greatly increase the chances of both accidental and intentional human ignitions.”¹⁰ Recent science from Arienti, et al.

⁴ DellaSala, D.A.; Olson, D.M.; Barth, S.E.; Crane, S.L.; Primm, S.A. 1995. Forest health: Moving beyond the rhetoric to restore healthy landscapes in the inland Northwest. *Wildlife Society Bulletin* 23(3): 346–356.

⁵ USDA Forest Service. 2000. Forest Service roadless area conservation. Draft environmental impact statement. Vol. 1. Washington, DC: USDA Forest Service.

⁶ Weatherspoon, C.P.; Skinner, C.N. 1996. Landscape-level strategies for forest fuel management. Pages 1471–1492, in: Status of the Sierra Nevada: Sierra Nevada Ecosystem Project, final report to Congress. Vol. II. Assessments and Scientific Basis for Management Options. Wildl. Res. Ctr. Rep. No. 37. Davis, CA: University of California– Davis, Center for Water and Wildland Resources.

⁷ Johnson, R.F. 1963. The roadside fire problem. *Fire Control Notes* 24: 5-7

⁸ USDA Forest Service. 2014. Mount Hood National Forest 2014 Annual Report.

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3846032.pdf.

⁹ USDA Forest Service. 1998. 1991-1997 Wildland fire statistics. Fire and Aviation Management, Washington, D.C.

¹⁰ USDA. 2000. Forest Service Roadless Area Conservation Rule Final Environmental Impact Statement, Ch. 3

suggests that there is even a positive association between natural lightning fire frequency and road density.¹¹

Some research suggests that fuel reduction projects themselves may exacerbate fire severity in some cases as such projects leave behind combustible slash, open the forest canopy to create more ground-level biomass, and increase solar radiation which dries out the understory. Higher wind speeds through thinned stands may also be a consequence of thinning and fuel management, as could the increased amount of available nutrients in the production of fine forest fuels. Indeed, a US. Forest Service report on the Fourmile Canyon Fire found that “[i]n some cases, treated stands appeared to burn more intensely than adjacent untreated stands, perhaps because of additional surface fuels present as a result of the thinning.”¹² This is also somewhat consistent with the District’s own experience in the N. Fork Mill Creek project area, where the Government Flats fire burned through the canopy of units that were recently thinned. High winds, steep slopes and highly combustible slash contributed to the fire severity.

Along with reducing the road network within the project area, thinning prescriptions should not open up tree canopies to a level that increases wind speeds (<60% crown closure) and understory vegetation response, which is associated with increased fire spread.



Figure 1: OHV-related sign on FRS 4820-130 in Rocky project area

AVOIDANCE OF UNAUTHORIZED OHV IMPACTS

In past projects in Mt. Hood NF where timber sales have overlapped with areas of existing OHV use, Bark has witnessed certain OHV users utilizing newly opened routes associated with the timber sale, adding further impacts to the area, and making it difficult for the agency to complete the road work included

in the project. We understand that

¹¹ Arienti, M. Cecilia; Cumming, Steven G., et al. 2009. Road network density correlated with increased lightning fire incidence in the Canadian western boreal forest. *International Journal of Wildland Fire* 2009, 18, 970–982

¹² Graham, R.T., et al, 2012. Fourmile Canyon Fire Findings, USDA For. Serv. Gen. Tech. Rep. RMRS-GTS-289. Ft. Collins, CO

this type of behavior is more rare in the Rocky area than in other parts of the Forest we monitor, however we believe the FS should still do what it can to reduce these impacts (as their occurrence is inherently unpredictable). **We believe the FS could avoid this by 1) ensuring controlled access to any treatment units during implementation (including blocking access in between operating seasons); and 2) timely & secure access closure of any reopened areas - upon the project's completion.**

LOGGING IN RIPARIAN RESERVES CONTRADICTS THE RECOMMENDATIONS OF THE BEST AVAILABLE SCIENCE AND THE AQUATIC CONSERVATION STRATEGY

Approximately 16% of the proposed project area is in protected Riparian Reserves. Commercial logging in Riparian Reserves is allowed only when necessary to “acquire the desired vegetation characteristics *needed* to attain ACS objectives.” *NFP at C-33*. Complying with the ACS objectives means that an agency must manage the riparian-dependent resources to maintain the existing condition or implement actions to restore the conditions. *NFP at B-10*.

The MHNH has not yet established the need for commercial thinning to attain ACSOs – aside from stating that the riparian vegetation is overstocked with relatively uniform trees with low levels of diversity. This generalized statement does not support felling and removing trees in Riparian Reserves, as needed to attain ACSOs.

A recently published peer-reviewed study by two research scientists from the National Oceanic and Atmospheric Administration (NOAA) directly addressed the question of whether commercial thinning enhanced, or retarded, attaining riparian biodiversity¹³.

This study looked in-depth at the current peer-reviewed science focused on the impact of thinning in regrowing Douglas-Fir forests in riparian areas. While Bark suggests that the MHNH read the study in full, and has attached it to be included in the Administrative Record, the important points are as follows:

¹³ Pollock, Michael M. and Timothy J. Beechie, 2014. Does Riparian Forest Restoration Thinning Enhance Biodiversity? The Ecological Importance of Large Wood. *Journal of the American Water Resources Association (JAWRA)* 50(3): 543-559. DOI: 10.1111/jawr.12206

- The rationale for commercial thinning is that it should increase the growth rates of the remaining trees and thus more rapidly develop a forest of large diameter trees.
- However, the key driver creating biologically diverse forested riparian ecosystems is not large live trees, rather it is a steady supply of large deadwood.
- Thinning minimally increases the production of large diameter deadwood, while creating substantial losses in deadwood of other size classes, with no acceleration in the production of these size classes.
- The “no-thin” scenario produced substantially more deadwood across a wide range of sizes useful to a variety of vertebrate species
- Passive management may often be the treatment that will best enhance biological diversity in degraded riparian forests.
- Thinning in riparian areas should generally be limited to situations where large deadwood is already abundant.
- Any efforts to actively restore riparian forests for the benefit of certain species should be treated as scientific experiments and proceed cautiously, skeptically, and with robust pre- and post-data collection efforts.

This report directly counters MHNH’s approach to riparian logging as a one-size-fits-all approach to meeting the goals of the Aquatic Conservation Strategy.

It is time to lay to rest the approach to “restoration” that includes commercial timber extraction from Riparian Reserves. This has never been the intent of this land designation, and it is not scientifically justified. Bark said all of this in its Jazz, and Red Hill, and Lava, comments – and MHNH chose not to listen. Now that the NOAA Fisheries scientists are concurring with Bark’s conclusions, **we hope that the Forest Service will listen with a more attentive ear and remove the Riparian Reserve logging units from the Rocky timber sale.**

RIPARIAN MONITORING

The WRWA discussed the lack and inadequacy of riparian monitoring throughout its analysis. For instance, the WRWA states, “[n]one of the allotments have been monitored for streambank condition, water quality, native plant community composition, and factors that affect the health and aquatic ecosystems.” *WRWA at C-35*. Hence, the WRWA’s recommendation that the Forest Service implement an annual survey program focusing on particularly the lasting effect of physical cattle damage in riparian areas. While the Grasshopper

allotment is currently vacant, Bark is not aware of the annual survey program recommended by the WRWA ever being implemented. Was that monitoring program implemented? Were annual Level 2 stream surveys conducted on the streams in the project area and did they incorporate the physical damage monitoring? What were the results? Were effectiveness (long-term) and validation monitoring conducted in the project area? If the monitoring required by the NWFP and WRWA was not implemented, the Forest Service cannot support the position that active management proposed will move the riparian areas toward the desired conditions of the WA, and ACS objectives.

A9 KEY SITE RIPARIAN AREAS

Approximately 2% of the Rocky project (~170 acres) is within the A9 Key Riparian Area allocation of the Forest Plan. The Plan states that “(w)ithin water/riparian emphasis Management Areas, riparian-dependent resources (fish, water quality, wildlife habitat) will receive preferential consideration when conflicts occur among land use activities.” *MHNF LRMP at Four-18*

For the Rocky project analysis, please address how proposed activities within the A9 land allocation would:

1. “Maintain or enhance habitat and hydrologic conditions” *Four-179*
2. “Maintain or increase fish habitat capability” *Four-17*
3. Result in “reductions in sediment and decreases in late summer stream temperatures.” *Four-17*

The Forest Plan also states that “Public concerns and Forest Service management needs require that activities in riparian areas that might impact water uses be monitored and documented to ensure that watershed management goals are realized”. *Four-19*. Has there been this type of monitoring in the A9 land allocations within Rocky? And if so, what trends have arisen from this monitoring that will be incorporated in the analysis for these areas?

EXCEPTIONS TO MT. HOOD LRMP STANDARDS & GUIDELINES

The language in the Rocky scoping letter makes it clear that the FS is considering making Forest Plan exceptions to implement the level of fuels reduction work they desire to complete with this project. As the Forest Service has been consistently excluding itself from Forest Plan standards and guidelines in nearly every timber sale in every district, Bark is concerned about the cumulative impacts of so many sales failing to follow LRMP standards. Adherence to these

protective standards in the other timber sales was considered but not fully developed because it would “not meet the purpose and need.”

The 2007 Thin EA, Jazz EA, Rethin EA, and Grove EA all used the exact same boilerplate language for exemptions they make to Forest Plan standards. This shows that the Forest Service did not make a thorough, site specific determination that this exemption is warranted. Please include such specific analysis in the forthcoming EA. Not knowing what standards and guidelines the Forest Service is considering excepting themselves from, we are concerned that this project will excessively remove essential wildlife habitat and nutrients from the forest and requests a thorough discussion of the reasons behind, and impacts of, such action. **We also request that the FS pursue consideration of an alternative which does not require exceptions to the Forest Plan, for the public to review in the EA.**

RESTORATION OF ASPEN MEADOWS

It is Bark’s understanding that one of the objectives of this project is to restore aspen stands and meadows, and where possible, introduce new aspen groves. As meadow openings were naturally prolonged in the past by fires, we recommend the use of fire to perpetuate existing areas of meadow and to stimulate and create openings for existing aspen clones.

Bark recommends that heavy machinery be kept on existing system road surfaces to protect wet areas, protect perennial grasses and forbs, and so as to limit additional conversion to annuals.

To discourage encroachment, Bark believes meadow margins should be thinned of only small-sized, young conifers to prepare for reintroduction of fire. Larger conifers on the margins can then experience some protection from an underburn.

Finally, Bark believes that cattle grazing *should not* be allowed in or near these meadows post-implementation of the aforementioned activities.

CATTLE GRAZING IN THE GRASSHOPPER ALLOTMENT

We have received communications from FS staff that the Grasshopper grazing allotment may be under consideration for being reopened. This seems significant to the assessment of potential impacts combined with the Rocky project. When assessing the significance of Rocky, NEPA requires that the 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

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).

The WRWA acknowledges the correlation between livestock grazing and bank instability, sedimentation, and increased stream temperatures, stating "Hoofshear damage to some streambanks within the grazing allotments contribute to sediment and decrease the width to depth ratio of the channel, increasing water temperatures." *WRWA at C-40*. Knowing this, the FS must account potential cattle-related impacts to riparian areas if added to commercial logging in the Rocky area.

If reissuing the Grasshopper allotment is a foreseeable future action, please make this explicitly clear in the EA, particularly in regards to the combined effect of any ground-based activities with grazing on riparian health and integrity. **Ensure that the analysis adequately quantifies, assesses and discusses previous and potential future cumulative impacts of grazing.**

DIAMETER LIMITS TO PROTECT LARGE TREES IS NECESSARY TO MEET PURPOSE AND NEED



Figure 2: Larger trees within Rocky burn plantations

When Bark volunteers walked into the plantations surrounding the 4820-130 road, we noted the presence of some trees that were larger in diameter than the younger planted pine and firs (Fig. 2). We believe that in the case of Rocky, removing large trees in any proposed treatment units is contrary to the project's Purpose and Need of restoring stand health and resiliency (conversely, a diameter limit certainly does not conflict with these two objectives).

A 21-inch diameter limit on trees cut (live and dead) would reduce impacts to existing wildlife habitat, ensure a viable future mixed-conifer seed source, while promoting human safety within all

proposed treatment units. Because of this, and to protect the most fire-resistant tree structure in these units, **Bark recommends retaining green trees at a spacing of 12 feet at the *maximum*, along with a 21-inch diameter limit on trees cut within these planned units.**

Bark believes that favoring large tree structure by imposing a 21-inch diameter limit would provide a higher level of resource protection and would differ from the proposed action by retaining the most fire-resistant, mature trees within the area that currently have no guarantee of being retained.

PRESCRIBED UNDERBURNING AS A SUBSTITUTE FOR WILDFIRE

Bark believes that prescribed burning can be a tool in restoring fire to the landscape surrounding the Rock Creek Reservoir, while ensuring the safety of the communities close by. We however do recognize that an underburn is not a fully adequate substitute for wildfire, and can have unintended effects.



Figure 3: Previously thinned Sportsman's Park unit #5, proposed for underburning

The underburning units that Bark volunteers have seen so far have very minimal fuel buildup (Fig. 3), and would seem to pose minimal risk of a fire reaching the canopy. There is abundant *Ceanothus* present in the area, the seeds of which would benefit reproductively by an underburn prescription.



Figure 4: Bald eagle at Rock Creek Reservoir

What season would underburning take place? If underburning occurs in the springtime, this could be [hatching/rearing time](#) for the bald eagles at the reservoir (Fig. 4). Soil moisture in the area will also be higher than naturally existing when fires historically burned at Rocky, and small birds and mammals may be more vulnerable to these blazes than if they occur in the fall.

CONCLUSION

Bark has some key suggestions for moving forward with the Rocky project, and request that the agency take these suggestions as separate alternatives or combinations of alternatives which the agency can then assess for their economic feasibility and value.

1. Withdraw this scoping notice to give the Wasco Collaborative time to work collectively on a Purpose and Need and Proposed Action for the Rocky Project;
2. Consider the road-related recommendations of the Coast Range Association's ACS report;
3. Assess all the roads included in the original Increment 3 scoping notice for potential decommissioning;
4. Do not pursue heavy thinning prescriptions that open up tree canopies to increases in wind speeds (<60% crown closure) and understory vegetation response;
5. Avoid unauthorized OHV impacts by 1) ensuring controlled access to any treatment units during implementation (including blocking access in between operating seasons); and 2) timely & secure access closure of any reopened areas - upon the project's completion;

6. Remove proposed logging in Riparian Reserves from the Proposed Action;
7. Pursue consideration of an alternative which does not require exceptions to the Mt. Hood Forest Plan;
8. See above recommendations under “RESTORATION OF ASPEN MEADOWS”; and
9. Retain green trees at a spacing of 12 feet at the maximum, along with a 21-inch diameter limit on trees cut within treatment units

As the Forest Service is considering the optimal method of accomplishing the purpose and need for the Rocky Restoration project, please consider that active management is not always the best avenue to achieve forest health. In the comments above, Bark has provided ample suggestions to improve this project – based on our field surveys of the project area and relevant scientific literature pertaining to thinning, roads, and forest health. We anticipate a thorough review of these comments and look forward to the necessary changes made to both the forthcoming EA and the project itself.

Thank you,



Michael Krochta

Forest Watch Coordinator, Bark