

Monday, July 22, 2002

Dear Jeff Walter:

I am writing to comment on the Orchard EA. I visited the sale after reading the documents and have several concerns.

- 1) **There should be no new road building.** There should not be a 200' road built in the LSR. There should not be any road built in the LSR. The effects of even temporary roads are permanent. The road leading to Unit 2 was grown over with 10 foot tall alders. Why re-damage an area that is just beginning to heal? Furthermore, as the EA states, the official road density of the area is 3.48. This is quite a lot, and this number does not state the decommissioned roads, as well as the roads used by ORVs. A true analysis of the effects of roads in this watershed should include those numbers. There are so many areas of young forest where restoration work can be done without building additional roads, why choose an area to prioritize to commercially log where more roads must be built to access the area?
- 2) **There should be no logging in riparian reserves.** According to the NW Forest Plan, you may only log in riparian reserves when needed to achieve the ACS. I saw no concrete reason in the EA as to why you must log in the riparian reserves to meet the ACS. The EA states that if no action would take there would be a "delay of development of stand diversity." That is, if no action would taken nature would take a long time, as nature often does. In order to speed up the process irreparable damage would be done. Do the short term negative effects balance out the long term project positives? I saw no real analysis discussing the potential plus and minuses in this document? Furthermore – 10' buffers on live streams?? That is crazy. That is practically logging right over the stream. I do not understand how that can possibly be acceptable.
- 3) **Cumulative Impacts:** Hiking through the Orchard area, what struck me most was how damaged the area was. I stood at several vistas in the area and the only standing tall trees in view were units 1,2 and 3 of Orchard. Yet the larger picture of what is occurring in this section of the South Fork seems neglected. I did not even read the word Cumulative Impacts in the EA document. How long ago were the previous logging projects? What is the projected regrowth of this area? How long will it take? For how long will this area of forest stand with no so minimal habitat remaining? What will that do to species diversity? When is the next entry into this area of the South Fork planned? These are questions that should have been answered in the Environmental Assesment.
- 4) **This sale violates the NW Forest Plan:** The Orchard EA is very clear that it considers this area C-1 Timber Emphasis and one of the main reasons for logging here is because blah blah blah. My understanding of the NorthWest Forest Plan is that when it has stricter environmental regulations it should override the Mt. Hood National Forest Plan. I consider the matrix land designation to be stricter than the C-1 timber empahasis plan because it says blah blah blah. Therefore, any

- planning of the Orchard Timber Sale as C-1 Timber Emphasis is in violation of the NW Forest Plan.
- 5) **Blow Down:** I am disappointed that there was no more information about blow-down included in this EA from the first EA. Following the Eagle timber sales, I would hope much more attention would be paid to the issue, and that there would be new information to include in this analysis. The EA does state that logging these trees will in the long run make them less susceptible to blow-down (although though it would be nice if the science behind this theory could be cited). My concern is over the short-term blow-down effects. As the EA recognizes the edges of the sales are being hit with heavy blow-down. It is hard to judge what the blow-down potential may occur as none of the trees (in units 1 and 2 at least) appeared marked. Nor is there any direct discussion of canopy coverage in the EA. To adequately discuss blow-down mention should have been made of what the current canopy closure is and what the expected canopy closure after logging will be.
 - 6) **Alternatives:** I am disappointed that the Forest Service did not include a Restoration only alternative with no commercial logging. The inclusion of such an alternative would greatly increase the legitimacy of the Forest Service's proposed actions to benefit forest health. While there is a nice range of alternatives in the Orchard EA, there is no alternative that concentrates the restoration efforts of the sale apart from the hazards of commercial logging
 - 7) **Canopy Coverage:** I am very concerned that the trees in this sale have not yet been marked. Neither did I find any mention of how much thinning was to occur in these stands within the documents. There is a big difference between thinning for forest health and thinning for timber volume. This is a difference both in what types of trees are removed (size, species etc) and what percentage of the trees are removed. Without the information about what percentage of the trees be removed in any given alternative, how can any reasonable decision about which alternative to choose be made? I am very concerned that too much of the canopy will be removed.
 - 8) **Species Habitat:** As mentioned in #3, this area has been hammered. The units seem surrounded by tree plantations. The Environmental Assessment mentions that this area is within 2 miles of Peregrine Falcons. It is also in Pine Marten and Pileated Woodpecker habitat. There is no discussion about where these species will go and what habitat that will use while logging is occurring and for the numerous years after logging while the effects of soil compaction are still being felt. The adjacent stands of trees will not provide them adequate interim habitat.
 - 9) **Difference between the 2 EAs:** I am very concerned about the lack of difference between the EA issued for Orchard 4 years ago and this recently re-issued EA. As far as I could tell, the only change seemed to be in the dropping of a Survey & Manage species and the suspicious changes to the economic analysis. I would think that in the past four years there has been new science and new studies. I would think that the USFS would have considered this new information and included a discussion in the EA about how all the new things we have learned about Forest Ecosystems, the relationship between logging and forest health and the effects of road building over the past four years apply to this sale. To assume

that the knowledge level we are going on as to how to manage this sale has not changed in the last four years seems suspect.

Sincerely,
Sarah Wald



P.S. Please keep me updated as to developments with this sale and other sales in the Clackamas Ranger District.