



BARK

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June 13, 2002

Mr. Jim Rice
Clackamas Ranger District
595 NW Industrial Way
Estacada, OR 97023

Re: Collawash, Oak Grove, South Fork, & Upper Clackamas Thinning Projects

Dear Jim,

We are writing to comment on the May 6, 2002 scoping letter requesting comments on the proposed thinning timber sales in the Collawash, Oak Grove, South Fork, & Upper Clackamas watersheds. While we might agree that there are some areas in the Clackamas District that need restoration thinning, we still have concerns about these timber sales.

4 Separate Projects

Although you sent out one single scoping letter on all four of these timber sales, we expect you will prepare four separate Environmental Assessments (EAs). The geographic scope is too broad for the sale issues to be handled by a single document: four watersheds, differences in elevation of thousands of feet with markedly different vegetation patterns, soil conditions, and existing wildlife.

The Science

One of the primary stated purposes of these four projects is forest health. We would like to see in the four EAs the science on which you are drawing your conclusion to log these areas for forest health. We have reviewed the recent PNW Research Station paper "Restoring Complexity: Second-Growth forests and Habitat Diversity" and, at least with the Collawash sale, what we see on the ground is in much, much better health than the second-growth forests they discuss in the paper. We would also like to see the science behind logging any native stands (naturally reseeded and regrown) included in this sale, if there are any. We are particularly wary of any commercial logging within stands that have never been logged.

Roads

With over 3,000 miles of inventoried roads within the Mt. Hood National Forest and over 1,300 miles of inventoried roads within the Clackamas River Ranger District, it is entirely inappropriate to even consider building new roads. Moreover, there are current timber sales within all four of the watersheds that will add new roads. We would like to see in each of the four EAs:

- The status of roads within the watersheds including, open road mileage, closed road mileage and roads listed in previous NEPA documents for obliteration that have not been obliterated;
- Roads listed for obliteration in previous NEPA documents that have not been obliterated;
- An estimation of “ghost roads,” roads not listed as open or closed but exist and are passable by 4-wheel drive motorized vehicles; and
- Current shortfalls for funding of road maintenance and obliteration within these four watersheds.

Considering that there are 6.2 miles of roads per square mile within the Fan Creek subwatershed of the Collawash watershed, there can be no additional roads in the Fan Creek subwatershed – temporary or otherwise. Having walked down roads built decades ago that still channel water, negatively altering the watershed’s hydrology, it is clear that there is no such thing as a temporary road. Nor is the Fan Creek subwatershed the only watershed/ subwatershed that would be effected by these sales that currently endures excessive roading.

The stated Desired Future Condition (DFC) for deer and elk notes that open road density should be at a level that allows animals a sense of security. We would like to see explained in each of the four EAs how additional road building in watersheds that already exceed the Mt. Hood Management Plan guidelines for open road density will meet this DFC.

The Collawash

Bark intends to examine each listed thinning unit for all four sales, however we have not yet made it to all of them. We started with an examination of the Collawash sale because is Tier 1 watershed under the Northwest Forest Plan. We were struck by how much the Collawash units did not look like the stands shown in the photos in the PNW Research Station paper “Restoring Complexity ...” The Collawash sale raises concerns above and beyond our other concerns with these timber sales, however these concerns apply to the other sales where the units are in a similar condition to the Collawash units.

- As previously stated, the Collawash watershed is a Tier 1 watershed. Consequently, protection of water quality for the sake of anadromous fish is the overriding objective. Please include in the Collawash thinning EA any quantifiable data showing how this project will help anadromous fish.
- The Collawash watershed is the most unstable watershed within Mt. Hood National Forest. After the Fish Creek watershed experience, all logging and road building within the Collawash watershed needs to end. Fan Creek has already shown signs of landsliding in the sales area. Moreover, we need to reduce the current negative impacts caused by the

existing roads by aggressive road obliteration. We would like to see in the Collawash Thinning EA a watershed or subwatershed (Fan Creek) restoration alternative that focuses on road obliteration.

- Nearly all of the units of the Collawash thinning project occur within areas documented as being High Landslide Risk.
- The Collawash watershed hosts 3.5 miles of roads per square mile; the Fan Creek subwatershed hosts an astounding 6.2 miles of roads per square mile. The impact of the existing roads and the planned roads needs to be addressed by the Collawash thinning EA.
- The Collawash units have very healthy groundcover and a burgeoning, mixed-species understory. We were more than a little surprised to see this. It seems that this may be uncommon for stands this age. If so, we suggest that a botanical survey of the Collawash sale is appropriate. It may be an important study area.
- There is ample justification for removing the Collawash from the timber base entirely. It is a Tier 1 watershed, it is the most unstable watershed on Mt. Hood, and it is prime anadromous fish habitat. The mitigation measures for many of the anadromous fish species discussed in appendix J2 of the Northwest Forest Plan suggest the removal of Tier 1 watersheds from the timber base.

Riparian Logging

We are concerned about the large amount of Riparian Reserve logging include in these four sales. What science are you basing the proposed Riparian Reserve logging on? We are also very concerned about the plan to create small openings in the Riparian Reserves. We would like to see in the four EAs the scientific basis for creating small openings in the riparian areas. We are especially concerned about the Riparian Reserve logging in the Collawash sale. Not only is the Collawash watershed very susceptible to landslides, but the Riparian Reserves in these units are recovering quite well. All the streams we have seen were covered in healthy riparian plant species, plus they had a strong understory – including western red cedar – growing up. The Collawash units appear to be a perfect example of an area that is capable of recovering on its own.

Deer & Elk Forage

We are unconvinced by the deer and elk forage justification for logging in these four watersheds. According to the Watershed Analysis, the Collawash is currently already 24% early seral, the Oak Grove is 27% early seral, the South Fork is 35% early seral, and the Upper Clackamas is 27% early seral. The Upper Clackamas Watershed Analysis definitively states that the logging practices (highly fragmented watershed in a highly fragmented sub-basin) of the past decades have favored deer and elk. Do we need even more logging that favors deer and elk? What about other species? Where does this deer and elk forage justification originate from? Where is the science? If you are going to continue with this ridiculous claim, we would like to see:

- the science showing a lack of current forage with a comparison to historical forage quantity and quality;
- numbers showing a decline in deer and elk populations;
- science showing a correlation between declining populations and lack of forage;
- evidence that other factors, such as excessive road building, are not to blame for any decline

- in populations;
- what plant species you hope to grow for forage in the newly created open areas;
 - what plant species deer and elk rely on for forage; and
 - evidence that these plant species are currently lacking in the stands proposed for logging.

The Scoping letter is not upfront about the impacts of the deer and elk forage issue. For example, the photos show a lightly thinned post-sale stand. But if one reads the Purpose and Need closely, it is clear that there would be numerous mini-clearcuts within the units. How will this assist with forest health? Please be precise about how the deer and forage creation would actually appear.

Blowdown

What is the scientific basis for the blowdown concern outlined in the scoping letter? Already we have seen a fair amount of blowdown in these units. How do we know that logging will actually decrease risk of blowdown? What are the short-term effects? What are the long-term consequences? Each of the four EAs should detail this issue with specific citations and examples.

Soil

Soil is not a renewable resource. All road building and logging, especially adjacent to riparian areas increases erosion. The sediments are dumped into the streams, a significant concern for all watersheds and of particular concern within a Tier 1 watershed. Each EA should address soil loss mitigation measures.

In a native forest, when a tree falls to the ground it acts as a physical barrier to the movement of soil down a slope. Over a short period of time the collected soil on the uphill side of a fallen tree sports a variety of young developing plants that further capture soil being transported down a hill. Thinned trees left in place would act to mitigate the soil losses and provide thermal cover as outlined in the PNW Research Station Paper. Each EA should address this issue.

Soil compaction caused by road building (in this case there is no difference between temporary and open roads since the soil compaction is the same) and soil compaction due to heavy machinery such as tractors significantly reduce an areas growth and re-growth (See Barstool EA). Each EA should address soil compaction mitigation and true soil restoration after temporary road obliteration so that temporary roads are truly gone afterwards.

Again, of particular concern is the Collawash sale. The soil in the Collawash units is very loose and fragile. Any activity in these units will cause serious erosion of the nutrient –laden topsoil, further exacerbating any forest health problems that do exist.

Purpose for thinning

The Northwest Forest Plan is an ecosystem management plan. While it provides for timber harvest it does so within a framework of maintaining and enhancing the biodiversity. Each EA should specifically address the specific manner in which thinning will maintain and enhance biodiversity with examples from previous studies.

Invasive Weeds

Invasive weeds are an increasing problem throughout the previously logged areas of the Clackamas River Ranger District. Of particular concern are the large concentrations of Scotch Broom (*Cytisus scoparius*) found on many of the existing logging roads. A casual examination of the area around the Collawash thinning units provides ample field examples of this increasing problem; fields of Scotch Broom result from their seeds having been transported deep within the subwatershed on logging trucks. The problems posed by the introduction of non-native invasive weeds are well documented, each of the four EAs should address both the removal of existing invasives from the thinning area as well as document the procedures used to keep another round of invasives from being introduced to each watershed.

Fertilization

It is worrisome to see that fertilization may be needed. Native forests received their nitrogen from a variety of sources, but two of the largest were from red alders (*Alnus rubra*) and the canopy dwelling lichen *Lobaria oregona*. Since *Lobaria* doesn't really start living in a forest's canopy until it reaches around 100 years of age and doesn't really become common until 200 years, it is too early for that native source to be considered. (Though it is a very important reason why all remaining mature and old-growth forests should not be logged.) But, if nitrogen levels are a concern then each of the four EAs should specifically mention the role of red alders as nitrogen native nitrogen fixing plants and document how they will be protected during the logging operation.

Each of the four EAs should specifically discuss both the application procedure for the fertilization and what fertilizer will be used.

Economics

It seems questionable whether these units are economical, especially in the Collawash sale and in Riparian Reserves, where some form of suspended cable yarding will be necessary. We would like to see an economic analysis of the four sales. If the sale is going to be a money loser anyway, we feel that adds more weight to our suggested restoration alternative: take the money that would have been lost on the timber sale and apply it directly to true restoration activities.

Elevation

We have seen significant differences within the thinning units based on the elevation of the units. Each of the four EAs should address the differences (botanical, soil, wildlife, hydrology) between the

units at different elevations.

Forest Health Alternative

Finally, we ask you to include a forest health alternative in each of the four EAs. In this so-called forest health alternative, we envision an analysis of other methods for thinning any unnaturally dense stands, such as felling the trees, leaving the trunks for down woody debris and chipping the limbs, done over a much longer period than the usual commercial timber sale. Road obliteration would also be part of this alternative, as would invasive plant removal. Such a project could truly address the any forest health issues, without the incidental – yet serious - damage caused by an intensive commercial harvest operation. It could also serve to provide a sustainable source of employment for timber workers.

Thank you for the opportunity to comment on these four thinning sales. Although it may not appear so from these comments, we feel there is the possibility here for some good projects. One of the first steps is to get over the rush to grow bigger trees. It is quite likely that the process of logging trees in these sales under a full-blown commercial logging operation will cause more damage than doing nothing or doing some much more light-handed. In other words, we fear that the remedy is worse than the disease, especially in the sensitive Collawash watershed. We have yet to be convinced that a commercial logging project is the best way to address the problems you note in your scoping letter.

Bark looks forward to your response to the issues we raise in this letter. We would certainly be open to a joint field-trip sometime this summer to look at these thinning units and to discuss the issues raised by these four sales.

Sincerely,

Gregory J. Dyson and Charlie Ferranti,
Bark