



November 27, 2008

Re: Lake Branch Thinning Timber Sale

Dear Daina,

Thank you for the opportunity to comment on the Lake Branch Thinning Timber Sale. Bark appreciates the chance to voice our concerns for this 2,200 acre project in the West Fork Hood River Watershed.

Please consider the following questions and concerns while preparing the Environmental Assessment for this project:

The opening of decommissioned roads is unacceptable. The Forest Service does not have the funds to be poured into massive road decommissioning only to return to them for future use. We are pleased to see so many miles of roads considered for active decommissioning under this project and through other restoration initiatives. However, this work will be compromised by any mileage of renovated or new roads that are built for logging.

Bark absolutely discourages the creation of temporary roads for logging purposes. Although the scoping letter states that these roads will be “rehabilitated” after use, we have rarely seen a successful obliteration of these roads. There are approximately 4,000 miles of roads in Mt. Hood National Forest. According to the 2003 Roads Analysis, more than half of these are unnecessary and therefore, candidates for removal. However, the Forest Service has proved to be unable to keep up with this needed work. Adding to the backlog with these temporary roads is a disservice to the public’s interest in clean drinking water and safe access on other roads to recreation destinations.

Will this project interfere with 2009 restoration plans? Bark understands that the West Fork Hood River watershed will be included in the 2009 round of road removal and aquatic restoration. The Mt. Hood National Forest has expressed desire to staying on track with this schedule. Indeed the West Fork Hood River Watershed Analysis lists the priority sixth field watersheds and Lake Branch on the top of that priority list. Due to sediment issues, the watershed analysis recommends that the Forest Service “favor road obliterations over road closures for unneeded roads.” (WHRWA, 65)

We will hope to see a full analysis of how these projects are related in the environmental assessment.

The scope of this project is too big. Bark does not support commercial timber sales at this size and scope. All too often this leads to an environmental assessment with too many unanswered questions. The need to attract timber companies to bid on projects should not be a driver when considering logging projects that hope to achieve a restoration objective, such as the Lake Branch Timber Sale. The Forest Service is not under any obligation to determine market feasibility when providing local economies with forest products. As logging projects on our national forests have moved away from late-seral forests and looked to younger forests, the scope of the project on the

landscape level have grown to include several different watersheds, as well as a vast range of prescription and management. While the impact of logging in these younger forests may not lead to the permanent loss of our old-growth forests, they continue to have significant impacts on the watershed due to their large-scale. We expect to see the range of subwatersheds where the units for the Lake Branch timber sale are proposed, to be considered both as specific to the subwatershed and also, cumulatively to the larger West Hood River Key Watershed.

This project is near to the Lost Lake recreation area. Impacts to the access and use of this popular hiking, fishing and camping area must be included in the environmental assessment.

Thank you for the opportunity to comment on this proposal. Please contact me with any questions.

Sincerely,

Amy Harwood
Program Director
Bark