

Brad Keller and Keith Walton
Acting Field Manager
Cascades Resource Area
1717 Fabry Road SE
Salem, OR 97306

June 30, 2003

Re: Comments of Lulay Camp EA No. OR-080-03-17.

Dear Brad and Keith--

Thanks for the chance to look over this project. In general, as you know, we support thinning in young managed stands. The forests in Crabtree and Thomas Creek are lacking of older forest types and thinning of dense young stands places them on a trajectory to develop into older, more complex forests.

The variable density thin in the connectivity block and riparian reserves looks very promising and exciting. We would encourage a slightly lower residual tpa in the more heavily thinned portion of the variable density thins, especially in the connectivity block, creating small gaps (.25 acres in size) that could support shade-intolerant conifer establishment to encourage more species diversity in the predominantly hemlock stand.

Commercial thinning of 243 acres of 40-60 year old trees in GFMA designation is exactly the type of project what ONRC would like to see prioritized for the Cascade Resource Area. As you note in the EA, these types of prescriptions leave significant options open in the future. BLM should consider heavier thinning prescriptions in portions of the GFMA stands, thinning them down to 50-60 tpa while thinning other areas more lightly as suggested (to 120 tpa) in order to diversify the stands. A variable density thin, as opposed to a uniform, thin from below prescription, would give these stands even more options for the future and would still be consistent with the timber goals for GFMA lands and the priorities listed on page 10 of the EA. These priorities for leave trees, which are to "retain relatively large and high quality trees at a spacing that would encourage rapid growth, healthy trees, and a wind firm stand of timber" could still be met with a thin that is not wholly uniform.

It appears that BLM has worked for retention of largest trees and some deformed trees for structure, particularly in the density management units. ONRC has no concerns with the partial cut prescriptions for the 42 acres of 60-70 year old stands that have previously been commercially thinned.

ONRC is pleased to see that the BLM plans on decommissioning 1200' of unnecessary roads that are within the riparian reserves and appear to be degrading water quality, and pulling the culvert after completing operations in 19A.

Your plans to do non-commercial riparian reserve treatments 50' away from streams in multiple entries appear to be well planned and appropriate for dense, uniform riparian reserves where removing the commercial material is not feasible given costs or risks.

Concerns:

Our major concerns, as I'm sure you may know, do not have to do with the trees that the BLM is proposing to cut. We are much more concerned about the infrastructure to haul the logs to the purchaser's mill. During this project, about a mile and a half of road currently either not constructed or reclaimed by the forest will be opened and constructed. This project would reconstruct 4000' feet of blocked/revegetated spur roads to thin 58 acres in units 33A and 33C. ONRC feels that this small amount of thinning does not justify this amount of roadwork. There appears to be a mistake in the EA where the BLM neglected to include reasoning for why the roads have been abandoned, what condition they are in now (page 6). The portions of roads to be reconstructed are not shown on the maps on the website either.

We are also very concerned that two-thirds of a mile of temporary road will be constructed. Although the spurs will expedite the yarding of 91 acres of forest in units 19D and 33A, which is a significant portion of the project, we urge the BLM to reconsider the extensive new road construction, especially when the BLM is also considering reconstructing even more road that the forest has reclaimed. Portions of both units could be yarded using the existing road system, as both units are adjacent to existing roads that are uphill from the units (although we are uncertain as to the condition of the road adjacent to 33A—does this road need reconstruction?). While we agree that long skid trails following the same route as these proposed roads both cause soil compaction, we disagree that their impacts would be “essentially the same.” Roads require grading a surface, easing the spread of noxious weeds and altering sheet flow and capillary action of water more than an ungraded surface. Skidding equipment is run over slash and is designed to minimize soil disturbance, while road constructing equipment is designed to maximize it. Roads are more easily used by OHV's. If a heavily used OHV trail is already in the area, it is possible that new road construction/reconstruction will be discovered by OHV users even after stabilization efforts described in the EA.

We suggest that you drop the plans to reconstruct 4000' of roads, dropping units 33A and 33C. This would eliminate the need to construct a new roads spur into unit 33A, and drop only 58 acres from the project area. Would it be possible yard some of these units over the existing, passable road system?

We also have some concerns about the proposed regeneration of 12 acres in the stand impacted by windthrow. In the past, we have seen projects result in a cycle of windthrow, where the effects of blowdown continue over time as more and more of the

forest is savaged following windthrow, resulting in greater wind exposure to the remaining trees. The potential risks of windthrow in the forest adjacent to this unit was not described.

Sincerely,

Jeremy Hall
Northwest Field Representative
Oregon Natural Resources Council