

To: Hilary Henry, Sweet Home District Planner  
Re: Scoping Comments on the Upper Canyon Project (Project 64261)  
From: Milo Mecham  
Date: December 15, 2023

Thank you for the opportunity to comment on the Upper Canyon project.

While it is not easy to make specific and detailed responses to the general statements of intent, purpose and scope, I do have the following comments:

- First, there needs to be a clarification, or a modification, of the intended project. The notice says that one of the purposes (number 2) of the project is to “actively manage timber plantations and the landscape.” You must clarify that the scope of the project is limited to timber plantations. It would be inappropriate if the project included in any way the cutting of any trees over 80 years old by incidental inclusion as part of the “landscape.”. Such harvesting would be directly contrary to recent Presidential orders and Agriculture Departmental directions to preserve old growth trees.
- It is apparently contrary to the goal of appropriate management of riparian reserves to create meadows along the Two Girls Creek (area 48) because it will likely remove the shading necessary for the survival of young salmonids and the health of creatures adapted to survival in a Cascade forest. Similarly, there are a number of areas where the boundaries of the numerated logging areas cross streams. This is likely to deteriorate the streamshed due to crossing the streams by equipment and logs. Even if the areas being logged include only intermittent streams, unless logging is limited to times when the streams are not running and there are restrictions to protect the streamside, there will be harm to the riparian areas. Of course, if logging is limited to times of no stream flow, the risk of fire is increased. The solution is to redraw the individual treatment areas so that the boundaries, including the areas of meadow creation, do not cross any of the designated streams.
- The only activities related to the creation of the meadows are “fall and leave treatments, tree removal, girdling, and piling and burning.” Meadows are not created simply by removing trees and burning the leftovers. The areas for designated meadow treatment should be selected because they are ecologically appropriate, so that the meadow is likely to last longer than a few seasons. There is no indication that this is the case. Further, there should be an indication of the positive seeding of the area with native species. Ecologically valuable meadows are not created simply by designating an area for a clearcut.
- Thinning should not increase the fire danger, which is often the case when aggressive thinning opens the forest canopy for a burgeoning understory. You should limit thinning to mimic the natural process. A maximum thinning to leave something like sixty percent of the canopy should be adhered to for all areas. This will help keep the area under the remaining trees from drying out unnaturally, which will more closely match naturally maturing forests and will help reduce fire danger.
- Much of the area of Canyon Creek contains steep slopes. Any unit with such slopes should be set aside for special treatment. If helicopter logging is not possible, then the areas should not be logged. No roads should be built or revitalized if the road crosses an area with a steep slope.

What can be characterized as a steep slope depends on the nature of the soil, but in the absence of some other characteristics, a slope in excess of 30 degrees should cross the margin into qualification as steep. The threat of erosion and landslides from road work and logging on these steep slopes creates too much potential for harm to wildlife, especially in the streams which are below all of the units of this project.

While I appreciate the District allowing some additional time over the Holiday season for the submission of scoping comments, the season (winter) itself makes it difficult if not impossible to pay a visit to the project area and thus to make specific comments about specific units. Thus, I and others are not able to field-check and then make comments about any prospective units that may have been mis-included because they actually contain trees that are over 80 years old. Similarly, an inspection of the slopes involved in any of the areas is impossible at this time of year. Thus, the identification of areas in the eventual EA should err on the side of protecting any area which has the potential of being removed because it does not meet the criteria for limited impact for 80 plus year old trees or will not actually enhance the environment for listed species because of the steep slopes.

I do appreciate the opportunity to comment and would like to be included in notices of any future decision making processes.

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