

Grasshopper Restoration Project Draft EA Comments

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Please consider these comments for the Grasshopper Restoration Project (#56470) Draft EA:

1. Fuels Report

- There is no discussion or mention of the 1994 Grasshopper fire¹ (page 2-74) which burned approximately 180 acres within the Grasshopper Restoration Project's project area in 1994. That fire burned through several of the current project's proposed units (particularly 95, 126, 127, 173, 182, & 184). This fire was only about 30 years ago so it is somewhat recent. It was also salvage logged (Grasshopper Salvage in 1995/1996) so did this not sufficiently reset the understory conditions in these project units as desired under this project's purpose & need?
- The Project Area has had a number of previous thinning applications- 3 Conifer Project (Timber Sales Con 1-5, see attached), First Base 2 in 2020², Slide 15 in 2019³ and 2020⁴, Badger 45 in 2019⁵ and 2020⁶, and another pile thinning in 2020⁷. While the Fuels Report acknowledges prior treatment activity within the project area, there is no discussion on why these previous treatments are now considered insufficient and require additional work. I would like to see the Forest Service discuss this issue and why the outcome for this project will be any different.

2. Vegetation Report

- The vegetation report also fails to identify and consider the 1994 Grasshopper fire in its cumulative impacts section.
- From Page 3: *"Even aged stand conditions are typically defined as those where the ages of the trees are generally within about 20% of the average stand age. Even aged stands can be created though both artificial and natural disturbances. Plantation forests are the best example of even-aged stands, as often they are created using seedlings or clones from a common set of parents. The planted trees are all the same age since they are planted at the same time."* Given that Alternative 2 includes Shelterwood Harvest (which removes 85% of the existing stand), how can the Forest Service justify this treatment? It will, in effect, create even aged stands. This is contrary to the stated purpose and need.
- From Page 11: *"Ultimately, with no vegetation treatments, the stands would remain in dense overstocked conditions with little understory reinitiation....When stands develop in this manner, they become more susceptible to blow down in large groups."* Why is this not considered understory reinitiation? It opens the canopy to more light and provides downed woody debris recruitment, all while retaining any stored carbon.
- Why is stand age not included in Appendix B Vegetation Treatment Table? If canopy closure percentages can be included, so should stand age.

3. Project Design Criteria

- More specificity in the PDCs should be provided for silvicultural operations within the Inventoried Roadless Areas (IRAs). For example, how will thinned materials within the IRA will be moved around on site for placement in burn piles? Will this be done by hand? Mechanized means?

4. Climate Change

- In the summary on page 1, the Climate Change report claims that “...Activities proposed by Alternative 1 (the “Proposed Action”) and Alternative 2 (the “Shelterwood Alternative”) would result in some carbon emissions and some carbon sequestration.” Where is the evidence that the project would sequester any carbon? In the next two points, I will attempt to show how the project will only result in a negative carbon balance (and a sizeable one at that).
- Hoover & Smith (2021)⁸ found that west side Oregon forests store 128.6 tons of Carbon per hectare (51.95 tons / acre) and sequester an additional 1.66 tons per hectare (0.66 tons / acre) of additional carbon per year. Turner & Guzy (2004)⁹ found that stands younger than 14 years of age had a negative carbon sequestration and Suchanek et al (2004)¹⁰ found that stands younger than 20 years had negative carbon sequestration rates. Smith et al (2006)¹¹ and Gower et al (2006)¹² estimate that 46% of stored carbon is released back into the atmosphere as logging residue.
- Assuming the release rate of 46%, the project’s 3,858 acres will release 92,194 tons of carbon when logged and would not be able to sequester 51,054 tons of carbon during the next 20 years for a total loss of 143,248 tons of carbon. Conversely, if the project is not logged and allowed to continue to sequester carbon at an annual rate of 2,561 tons of carbon, the project acreage would sequester an additional 51,234 tons of carbon. This is a swing of 160,000 tons of carbon (+251,657 T/C for no action vs +91,194 T/C for either action alternative). I would argue that this would result in a significant regional impact.

5. Northern Spotted Owl

- The Wildlife Report states that either action alternative (1 or 2) would “further reduce canopy cover and delay the attainment of suitable habitat by as much as 75 to 100 years” but I can’t see how this is not effectively a permanent impact rather than some sort of temporal impact. Previous projects such as the 3 Conifer project have degraded the existing NSO and prey habitat in the same manner as proposed here, and with the same likely claims of temporary degradation. Still- the Forest Service is going BACK into the same stands that were degraded twenty-some years ago and doing it all over. It appears to be an endless cycle with no patience to allow the habitat time to recover. This may be a thinning project but its ultimate impact is the same as clearcutting.
- The discussion of RA-10 & RA-32 Habitat on page 10 is somewhat confusing. The definitions provided of both “High value Spotted Owl Habitat” (RA-10) and “High Quality Spotted Owl Habitat” (RA-32) appear to be the same and while the Forest Service says that RA-10 habitat will be maintained, it states that RA-32 “would be” maintained. Has the Forest Service evaluated *any* of the proposed stands for preservation as RA-32 habitat? Appendix B lists 26 stands that are suitable NSO habitat: 3, 9, 141, 147, 148, 150, 157, 161, 163, 173, 184, 186, 187, 190, 191, 193, 193L, 201, 204, 206, 211, 213, 219, 220, 222, 223, 226, and 271. Have any of these stands been evaluated for preservation as RA-32 habitat?
- Have there been any Survey & Manage Red Tree Vole surveys? Have any of the previously mentioned 26 units been surveyed for Red Tree Vole? The most recent Mt Hood National Forest project, Zigzag Integrated Resource Project, did survey for Red Tree Voles and included a summary of those efforts in the EA. The Mt Hood National Forest should be consistent in its project analysis, especially when critical habitat is present and part of the project area.

6. Temporary Roads

- The EA on page 9 says approximately 17 miles of temporary roads are anticipated. That’s a pretty large number so it appears that the Forest Service has a pretty good idea of where these roads are proposed. Why are the locations not included? Other federal agencies such as the Bureau of Land Management are able to (and do) provide this information in their EA analysis.

References Cited in these Comments:

1. USDA Forest Service. *"Monitoring and Evaluation Report Fiscal Year 1998 Mount Hood National Forest Land and Resource Management Plan."* 1999. (166p)
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2. <https://www.flickr.com/photos/barkformthood/50215091776/in/album-72157674673613678/>
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7. <https://www.flickr.com/photos/barkformthood/51134698666/in/album-72157674673613678/>
8. Hoover, C.M., Smith, J.E. *Current aboveground live tree carbon stocks and annual net change in forests of conterminous United States.* Carbon Balance Manage 16, 17 (2021). <https://doi.org/10.1186/s13021-021-00179-2>
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10. Suchanek, T.H., Mooney, H.A., Franklin, J.F., Gucinski, H., and Ustin, S.L. 2004. *"Carbon Dynamics of an Old-growth Forest."* Ecosystems. 7: 421-426
https://www.researchgate.net/publication/273319184_Carbon_Dynamics_of_an_Old-growth_Forest
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12. Gower, S.T., A. McKeon-Ruediger, A. Reitter, M. Bradley, D. Refkin, T. Tollefson, F.J. Souba, Jr., A. Taup, L. Embury-Williams, S. Schiavone, J. Weinbauer, A.C. Janetos, and R. Jarvis. 2006. *Following the Paper Trail: The Impact of Magazine and Dimensional Lumber Production on Greenhouse Gas Emissions.* Washington, D.C.: The H. John Heinz III Center for Science, Economics and the Environment. (Not Available Online)



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3 Conifer

Jump to Topic:



The 3 Conifer sale logged in an inventoried roadless area adjacent to the Badger Creek Wilderness. It is the last salvage logging rider sale on Mt. Hood.

GENERAL INFO

District: Barlow

Total Acres: 3087

Watershed: White River

Sub-Watersheds: Threemile Creek
Rock Creek
Gate Creek
Souva Creek

Basic Location: South of Badger Creek
Wilderness, east of Rocky Butte, along
roads 4810 and 4811

Driving Directions: South of Badger Creek
Wilderness, east of Rocky Butte, along
roads 4810 and 4811

Legal Description: T3S, R11E sect. 30-34
T4S, R11E, sect. 2-6, 16-21, 29 and 30 T4S, R10E sect. 1, 2, 12, 13, 23, and 24 T3S, R10E
sect. 25, 26, 35 and 36

Total MMBF: 24

Total CCF: 60714

TIMBER SALES

Con 1 (792 Acres, 24 MMBF, 11628 CCF)
Sold on Dec-02-1996 to Bugaboo Timber Co.
Status: **Finished**



[Notes from the Field](#)
HTML File, 8 Kb
1/25/05



[Conifer Map 2](#)
JPEG Image, 93 Kb
5/28/03



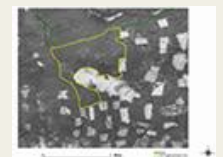
[Conifer Map 1](#)
PNG image, 318 Kb
5/28/03



[3 Conifer Planning Alternative 1](#)
JPEG Image, 93 Kb
3/25/03



[3 Conifer Planning Alternatives 2 & 3](#)
JPEG Image, 2071 Kb
3/25/03



Con 2 (407 Acres, 8592 CCF)

Sold on Dec-03-1996 to Bugaboo Timber Co.

Status: **Finished****Con 3** (677 Acres, 18446 CCF)

Sold on Dec-10-1996 to Bugaboo Timber Co.

Status: **Finished****Con 4** (743 Acres, 14629 CCF)

Sold on Dec-19-1996 to Bugaboo Timber Co.

Status: **Logging****Con 5** (468 Acres, 7419 CCF)

Sold on Dec-10-1996 to Thomas Creek Lumber

Status: **Finished****PRESCRIPTIONS**

Total Regeneration Acres: 208

Total Commercial Thin Acres: 2913

"Purpose & Need:" The Forest Service states that the purpose of this project is to salvage disease or insect infected dead, damaged, or down trees before the usable wood fiber is lost to decay.

Bark's Comments: 1597 Overstory " thin"

HABITAT & SPECIES

S&M Species: Great Grey Owl

T&E Species: NSO 1996? Bi-Op

Updated 5/7/09

BARK

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Ruminations on the Northwest Forest Plan, The Northern Spotted Owl, & The 3 Conifer & Upper Boulder Timber Sales

By Gradey Proctor

Right under our noses, two egregious timber sales are logging some of the last acceptable land set aside for the threatened northern spotted owl on Mt. Hood National Forest. This land is known as “critical habitat,” and was designated as such by the US Fish and Wildlife Service. Such activity has been found to be illegal by the 9th Circuit Court of Appeals in a lawsuit that Bark along with many other groups participated in. The Forest Service, however, continues to allow the trees to fall. This fact inspired one of Bark’s stellar volunteers to go out and visit these areas, known as Upper Boulder and 3 Conifer Timber Sales. Together these sales destroy over a thousand acres of owl habitat and place a dozen pairs of owls at risk. They also border the Badger Creek Wilderness—one of those small parcels of land we humans set aside for other forms of life.

First, What Is the Northwest Forest Plan?

In 1992, the Northwest Forest Plan was designed to manage the forests of the Pacific Northwest and protect the northern spotted owl. Yet this was implemented under the notion that as long as habitat was available somewhere, anywhere really, then it was acceptable to log spotted owls right out of their homes. According to the Forest Service this is known as an “incidental take.” They operated under the notion that we need a certain number of spotted owls to maintain their listing as endangered. So for example, if Oregon needs 100 and each needs 100 acres of Old Growth, then all the Forest Service would need is 10,000 acres of suitable habitat. The problem with this is that it allows the Forest Service to log known habitat where owls are known to be-- knowing that they are likely to perish by such activity. Second, it does nothing to actually improve their recovery, which is a key component of the Endangered Species Act. Instead they are knowingly logging this species to extinction.

Ninth Circuit Comes to the Rescue!

The new ruling by the Ninth Circuit Court of Appeals says that the Forest Service is not acting in concert with the Endangered Species Act by not actively trying to preserve the owl. The ruling states that one can’t use habitat availability as a guideline but needs to protect the actual owls and their actual homes to ensure the continuity of the owl. It seems like such common sense, but the Forest Service has actively denied this since the inception of the Northwest Forest Plan.

Into the Field: 3 Conifer

With all this in mind I went to check out the 3 Conifer timber sale. When I began

doing some research on the sale I learned that 7 owls were having a drastic cut in their available habitat, one pair of spotted owl unfortunately residing in 3 Conifer started out with 407 acres and with the implementation of this plan they are now going to have to try and get by on 288 acres. The chances are not good that this pair will be able to exist with the loss of 119 acres. Timber sale planners had informed us that 283 acres of Critical Habitat is still destined to be cut, so I went out with another Bark volunteer with the hopes of finding where this habitat is. After a day of driving and map deciphering, we reached the area known as Con 2. We met with the security guard who informed use that the road was too muddy for us to pass in our passenger car. At the end of this road is the Three Mile Trail which allows hikers access into the heart of the Badger Creek Wilderness. I wondered how many people were now unable to visit this beautiful area on account of the road conditions. With the recent rains and heavy machinery the road had 6 to 8 inch ruts. It made me wonder what is being done to the soil in the area on account of logging in the fall weather. We parked the car at the turnoff and walked the half-mile to where active logging was happening. It happened to be right at the turnaround for the three-mile trail. After spending the day looking at the effects of logging, we thought we'd hike some of the trail; yet where we began, we noticed that on one side of the trail there were signs informing me that it was a wilderness area, on the other side of the path were downed trees in piles. These are acres where known spotted owls reside, and part of a larger undisturbed landscape; **yet the Forest Service still plans to cut this habitat though it is scientifically and now legally known that this could extirpate these critters, and is another step toward our loss of those majestic birds of the night.**

Next, Off to Upper Boulder!

The next weekend I went out to visit Upper Boulder, just west of the 3 Conifer sale. The maps the Forest Service released on this sale have no road numbers, so it is a difficult sale to investigate. I first traveled up Road 4860, hiking through sales where 60% of the trees had been removed, 2 to 3 inches of slash was piled upon the ground, and the deep ruts traversing the skid trails conducting new flows of water disrupting the watershed. I later traveled up Road 4870 to see similar stands of trees. There is still active logging in what I am nearly certain is Unit 32. The road was blocked on this day by a stretch of wire and logging ahead signs. All along the opposite side of the road were steep slopes above Boulder Creek and an old cut struggling to support trees. It seems strange that they are doing the same here on the other side of the road when their past activities are right there just across the road making no progress to becoming a forest again. This unit is adjacent to the Late Successional Reserve and Boulder creek. This area is also considered "Critical Habitat" or at least was.

These two adjacent sales combined equate to a serious loss of habitat in the area of the Badger Creek Wilderness. There are still 283 acres of "critical habitat" left in 3 Conifer and we are still trying to wade through the vague Environmental Assessments of Upper Boulder to assess the losses there. It is known to the Forest Service that where they are logging is "critical habitat," which is both scientifically and legally unacceptable. The stewards of our land are turning their back on their job and likely costing a dozen pairs of spotted owls their lives.

See For Yourself! How to get there:

Both of these sales are north of Forest Service Road 48, and just south of the Badger Creek Wilderness area. For Upper Boulder head up 4860. 4870, the first right will, follow the sale up the western side, or continue up 4860 to follow the eastern side of the units. 3 Conifer is an extensive sale, from just across 4860 and all the way east to

Rock Creek Reservoir. Maps can be found at www.Bark-out.org.



3-CONIFER PLANNING AREA

ALTERNATIVES 2 AND 3

LEGEND:

- OPEN ROADS
- CLOSED ROADS
- - - PLANNING AREA BNDY
- ▨ STANDS
- - - OBLITERATED ROADS

