

October 2nd, 2018

Hello Allen and Bob,

I am writing to ask about Bear Creek, and to express my concerns. I've reviewed the objection resolution document that BMBP and the USFS agreed to for the RET portion of the Big Mosquito timber sale. The USFS Final Decision document includes the following objection resolution agreements:

“BMBP was concerned about RET in Bear Creek drainage. BMBP recognized the need for large woody debris in many streams within the project area including Bear Creek. BMBP had concerns with the silviculture prescription of openings for Bear Creek. I have agreed that for Bear Creek only, **we would drop the openings portion of the prescription, only implement felling/tipping of trees for the purpose of placing those trees into the creek**, and increase leave patches from 45-65% of the RHCA to 55-75%. **I have also agreed to invite BMBP to assist in identifying criteria for treatment in Bear Creek**” (emphases added).

I recently walked along Bear Creek. [Here is a link](#) to photos along the creek that include trees which appear to have been felled for placement near (but not in) the creek and within the RHCA-- not just in the stream, and not just for the purpose of placing those trees into the creek. There also appears to be openings created by the thinning, some of which are relatively extensive. BMBP never received an invitation from the USFS to identify criteria for treatment in Bear Creek, as per the objection resolution agreement. All photos are in or adjacent to the creek/within the RHCA. [Here are photos of Bear Creek pre-logging](#). (There are no exact photo points, as I can't predict exactly where the USFS will be logging. The “before” photos are not limited to the now-logged reach. I'm working on pulling out and mapping the GPS info from the photos).

BMBP has repeatedly expressed our concern about specific areas of proposed commercial and noncommercial logging within RHCAs based on our field surveys-- particularly those areas that support mature and old growth mixed-conifer forests and high-quality wildlife habitat. When we raise these concerns, we have repeatedly been told by you all and other USFS specialists that little if any thinning would be done in those specific areas, and that any logging that occurs would not at all resemble the “worst case” scenarios laid out in the USFS's NEPA analyses. The message from the USFS has consistently been that we should trust the USFS staff *not* to do what the USFS's NEPA analyses say will be done, despite the intensive silvicultural prescriptions outlined in the NEPA documents.

The USFS significantly erodes public trust if it does not honor objection resolution agreements. How are we to trust that the USFS will have a ‘light touch’, even despite NEPA documents stating otherwise, if the USFS does not honor their written objection resolutions agreements along these same lines with BMBP?

I am sympathetic to and understand the ecological importance of placing large wood in some creeks. During our field trips with the USFS and throughout our objection resolution discussions BMBP recognized that Bear Creek would benefit from some large wood placement. However, Bear Creek now looks like a construction zone, with the standard commercial timber sale aftermath—and includes openings which were specifically supposed to be dropped as per the objection resolution agreement. ‘Openings’ of logged areas in and adjacent to the floodplain are covered with slash and debris or have bare disturbed soils. In these areas, the multistory canopies, shrubs, and some of the hardwoods we enjoyed in the RHCA have largely been destroyed. It appears some of the snags and some decaying and larger downed wood has been lost. Logs placed adjacent to the creek are, in

some areas, at unnaturally parallel and even intervals, on what is now very compacted and exposed soils along the creek. This makes it look like a closed road running adjacent to the creek, where there previously was no road. Bare, disturbed, and compacted soils are pervasive throughout the logged reach. Cattle damage is pervasive and often extreme throughout the stream reaches, including in areas of recent logging. We certainly were not invited by the USFS to discuss criteria as per the objection resolution agreement.

- **Has the USFS done baseline monitoring of temperature or sediment within Bear Creek?**
- **Are there plans in place or has monitoring begun to look at before/after and upstream/downstream temperatures in relation to logging?**
- **Are there specific monitoring plans in Bear Creek or other creeks within the Big Mosquito timber sale? How about in the Camp Lick and Ragged Ruby timber sales?** No one I've talked to has been able to provide specific answers to these questions thus far, or been able to tell me who to contact to find out this information or related information.
 - For example, which specific creeks will be monitored, what kind of monitoring will take place, and what sorts of protocols will be in place?
- **How does the USFS expect to follow an adaptive management framework without adequate baseline information, or without targeted monitoring of how ecologically key parameters in RHCAs such as stream temperature and sediment respond to logging within RHCAs?**
- **What other creeks in the Big Mosquito sale have had RET noncommercial logging at this point?**

Bear Creek has been mentioned by the USFS as one of the perceived reasons why the USFS ostensibly 'needs' to commercially log within RHCAs, due to the extensive materials left on the ground that are now supposedly a fire hazard. However, it is clear from our objection resolution agreement that this material should never have been logged or left on the ground. Trees were supposed to be felled only for placement into the creek. We all agreed that there was a lot good going on in Bear Creek, particularly in the middle and lower reaches, and that the stream exhibited many signs of recovery. Mine tailings (which are still present), incising of the creek, and some cattle damage seemed to be the primary concerns for Bear Creek. Beyond placing wood into the creek to address some of the incising, logging fails to address these concerns, and instead causes a host of other negative ecological impacts (including increased fine sediments and temperatures).

Also, I repeatedly offered to give the USFS the GPS coordinates for the Columbia spotted frog I photographed adjacent to Bear Creek, as well as the nest that I thought to be a Northern goshawk nest. The USFS showed little to no interest. Based on our objection resolution agreement, I figured that we could either address these issues before implementation or that it might not be necessary given the supposed limited thinning that was to occur.

What happened?? Why did the USFS create openings, log beyond what was necessary for placement into creeks, and fail to invite BMBP to assist in identifying criteria for treatment in Bear Creek—all which break the agreements of our objection resolution?

I appreciate your consideration of my concerns. I look forward to hearing a response to my questions at your earliest possible convenience.

Sincerely,
Paula