

January 31, 2022

Mt. Hood National Forest
ATTN: Clackamas Fires Danger Tree Assessment
16400 Champion Way
Sandy, OR 97055-7248.

Re: Comments of Friends of Living Oregon Waters (FLOW) Clackamas Danger Tree Assessment Scoping

On behalf of Friends of Living Oregon Waters (FLOW), an Oregon 501c(3) nonprofit whose members and supporters have a long history of reliance on the Clackamas River Watershed for drinking water, fishing, spiritual purposes, and a variety of other uses, we are alarmed at the USFS proposal to conduct additional roadside tree cutting along over 200 miles of roads in the vicinity of the Clackamas watershed. Information provided in the scoping notice is inadequate for the public to be able to comment at the depth requested by the USFS, including this 4-page document from the scoping notice that provides no meaningful information about the 200-plus miles of roads involved other than the length or road segments addressed.

https://www.fs.usda.gov/nfs/11558/www/nepa/116859_FSPLT3_5817109.pdf Notably, the word “water” does not appear in the notice.

Thus far, the USFS’ approach demonstrates a lack of watershed-level assessment of impacts. Survivor trees have been logged already, and so the baseline status of the watershed is unknown. Projects on public lands have been developed with inadequate attention to soil compaction, riparian impacts, stream temperature impacts, sedimentation, and other significant issues that are already readily observable in the Clackamas River watershed due to ongoing post-fire activities. And the fire itself created significant impacts that are causing changes for the Clackamas River, a source of drinking water for tens of thousands of Oregonians.

Based on issues already present in the post-fire landscape, the USFS must provide more information about the status of roadside areas, many of which contribute large woody debris and retain and filter water headed for the Clackamas and its tributaries. Recent observable roadside clearing activities likely would contradict the USFS’ watershed protection goals if they were to be expanded into more areas. (Please see the related OPB story from the Spring which highlights impacts and concerns regarding excessive post fire logging - <https://www.opb.org/article/2021/04/29/lawmakers-investigate-reports-of-irresponsible-tree-cutting-after-wildfires/>.)

Further, the status of habitat for sensitive species received inadequate analysis to date for ongoing projects, much less an expansion of tree-cutting on this scale. The USFS states that, “The team working on this project has conducted an initial road-by-road review because of the complex diversity of needs and perspectives regarding how to best manage the needs of the

post-fire landscape, including access needs. The map accompanying this scoping notice illustrates the proposal for fire-affected roads resulting from the team's initial road-by-road review." The map offered shows a vast area, with many distinct drainages, streams, and wetlands. The road-by-road review does not appear to have been accompanied by a detailed watershed-by-watershed review. Further, the specific descriptions and status of the 200-plus miles of road in question linked in the scoping notice do not provide meaningful information for the public to offer input on how soil and water resources will be impacted. Based on the map, the USFS needs more information over a longer time period to understand and assess impacts to the many drainages that feed the Clackamas.

We urge the USFS to refrain from activities that impact key watersheds, habitats, and sensitive soils until more information can be provided to the public through an EIS. Future "danger" tree definitions and selected road segments should be as limited as possible, preferring the preservation of survivor trees and the sensitive areas where they remain. We oppose excessive roadside clearing that has clearly impacted water resources due to potential future impacts to soil, vegetation, wildlife, fish, and water resources. The USFS must take stock of damage already done to the watershed by logging and tree cutting conducted after the Labor Day Fires of 2020. Roadside and power line tree cutting work in the Clackamas Watershed has created significant turbidity discharges.

To give a tangible example of how upslope logging in a linear corridor near Highway 224 impacted the Clackamas, the public could readily observe excessive turbidity and sedimentation in the Clackamas already this Fall and Winter. In November, when these images were taken, visible discharges through culverts and other roadside areas changed the color of the Clackamas (see the much lighter area in the second image where turbidity alters the color of the Clackamas). The water itself coming off of the hillside was muddy, even milky, in appearance. The USFS must offer a much higher level of analysis and scrutiny to add any unnecessary impact to the watershed at this point, in such a sensitive time. Put simply, more of the damage depicted below is not good for the watershed.



Near Promontory Park, November 2021.



Nearshore turbidity all along Clackamas River shoreline from runoff from recent rains in November 2021. The nearshore lighter color comes from turbid, sediment-filled water near Highway 224, flowing under a culvert into the Clackamas River.

Unlike the Santiam River Drainage, where water quality impacts were directly observable by the public, much of the area already damaged by post-fire logging in the Clackamas Watershed has been entirely off limits to the public. Aerial and drone photography show a significant impact from the fire and post-fire activities to the watershed as a whole.

As we stated above, the USFS must conduct an EIS. NEPA requires a “hard look” at impacts for projects with potential negative impacts, and the USFS should pursue this analysis through an EIS, not an EA. Further, NEPA requires a clear statement of the status of the impacted project areas, and the USFS lacks adequate baseline data to determine impacts on rare, endangered species as well as salmon habitat. Impacts to water quality and quantity are already readily apparent from excessive cutting, such as turbidity and sedimentation of the Clackamas. An EA is inappropriate when the resources in question are altered and potentially damaged already.

As stated by others including BARK, lower-use roads should not be subject to tree clearing. More limited roadside clearing should not be a de facto bar against public entry by foot by those who are willing to undertake reasonable and appropriate precautions. We urge the USFS to strongly consider opening some roads to foot traffic that remain closed to vehicle traffic. Many people are used to hiking through burned forests. (Of note, areas in Southern Oregon impacted by the Biscuit Fire were not closed in the same manner, allowing for greater public participation in post-fire decision-making through direct public observations of watershed conditions).

Finally, the recent federal court decisions in cases brought by Cascadia Wildlands and others related to work in the Santiam River should give the USFS cause to pull back and consider an EIS, offering scoping for an EIS with new baseline data that provides more realistic assessments

of current watershed health, as well as fish and wildlife surveys over the large, complex project area.

Thank you for considering these comments.

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Joe Serres, Board President, FLOW

On behalf of FLOW:

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