

05/25/2022



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Clackamas River Ranger District
Mt. Hood National Forest
16400 Champion Way
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RE: Clackamas Fires Roadside Danger Tree Draft Environmental
Assessment #61043

Bark's mission is to bring about a transformation of public lands on and around Mt. Hood into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation. Bark has over 31,000 supporters¹ who use and/or rely on the public land forests surrounding Mt. Hood, including the areas within the Clackamas Fires Roadside Danger Tree Draft Environmental Assessment (DEA) project area, for a wide range of uses including, but not limited to: drinking water, hiking, nature study, non-timber forest product collection, cultural uses, and recreation. We submit these comments on behalf of our supporters. We request that you actively engage with the substance of these comments and use the information herein to create the best possible outcome for the Clackamas River Ranger District (CRRD).

ROAD RELATED IMPACTS WITHIN THE PROJECT AREA

One of the objectives of this project is to identify which roads the CRRD should exclude from danger tree cutting, which could result in road closures or decommissioning. Danger tree cutting should be limited to high use roads, roads with a high public need, or roads identified in tribal consultation. We're

¹ Supporters in this case is defined as significant donors and petition-signees which Bark has identified as being active users of Mount Hood National Forest.

supportive of the use of the Mt. Hood Travel Analysis Report² (TAR) to inform the project and determine whether roads should be closed or decommissioned and move the CRRD toward the desired conditions of a minimum road system (MRS)³. The DEA proposes danger tree cutting on approximately 23% of system roads (maintenance level 2-5) within the CRRD. We are supportive of the proposed decision to exclude roads anticipated to be decommissioned or changed to ML 1 (closed) from the area of consideration (AOC) for danger tree cutting.

We understand that the agency proposes to decommission approximately 9 miles of road and close approximately 31.5 miles of road and that danger trees would only be cut along these roads to the extent necessary to safely implement the action. We encourage the agency to retain trees that have a low probability of failure to the extent practicable to safely implement road closures and decommissioning. Additionally, to the extent possible project implementation should prioritize opening public access roads of highest concern before treating lower priority roads or roads proposed for closure or decommissioning.

RIPARIAN AND AQUATIC ECOSYSTEMS

Road densities and stream crossing densities in the Fish Creek watershed are the highest of any other watershed in the forest and have been determined to pose the highest risk to water quality and aquatic ecosystems⁴. Aquatic systems on federal lands may be disproportionately important for restoring and maintaining the natural processes and components of aquatic ecosystems in the Cascade Range. Fish creek and other Clackamas River watersheds may have the only viable habitat and refugia for fish and other aquatic organisms.

We are encouraged by the proposed decision to not treat any dead or dying trees that have a low probability of failure along NFS 5400000, where it runs parallel to Fish Creek, project design criteria (PDC) that will leave felled trees within riparian areas, and maximum retention of shade trees to the extent consistent with safety concerns. Limiting cutting trees within 150 feet of streams to those only necessary for safely implementing the project and leaving

² In 2015, the FS released its TAR, a synthesis of past analyses and recommendations for project-level decisions regarding changes in road maintenance levels. Included in this report was a [list of roads “not likely needed”](#), with the objective maintenance level being “D-decommission”.

³ 36 C.F.R. § 212.5(b)(1) (“For each national forest . . . the responsible official must identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.”).

⁴ USDA Forest Service, Mt. Hood National Forest September 1994. Watershed Analysis; Fish Creek Watershed. Pacific Northwest Region. p. 18

felled trees on site will minimize ground disturbance, erosion, and other harmful impacts.

This project provides a unique opportunity to plan and implement road-related activities to restore adverse hydrologic impacts to improve water quality and fish habitat. Road related activities should move conditions toward:

- Improving fish and other aquatic organism passage
- Reducing stream crossing density
- Hydrologically disconnecting road segments
- Addressing high failure potential stream crossings and surface erosion

Finally, the planning area hosts congressionally designated Wild and Scenic Rivers. All management activities within these river corridors must protect and or enhance the identified outstandingly remarkable values for those segments. We encourage the Forest Service to strictly follow danger tree criteria and project design criteria to minimize impacts in these areas.

DANGER TREE SELECTION AND AREA OF CONSIDERATION:

Although there are approximately 7,600 acres within the AOC we expect that due to mosaic burn patterns, site specific deviations from RAVG data, and other site specific conditions will restrict danger tree removal outside of the aforementioned Fish Creek corridor and along normally open roads to:

- Dead or dying trees within striking distance of the road determined to have a high probability of failure within five years
- Trees with foliage within striking distance of the road determined to have a high probability of failure within ten years

Although the AOC is informed by RAVG data, danger tree selection should rely on site specific conditions and individual tree-failure potential in the stated temporal scales. As discussed in correspondence with the NEPA planner on May 13, 2022 the final EA will remove the phrase regarding dead and dying tree removal, “regardless of the time frame when they may fall” from section 2.2.1.1 of the DEA. Additionally, the proposed action including danger tree selection should occur after public process and a signed decision notice. Finally, we applaud the meaningful consideration of several alternatives and scoping comments regarding the AOC and site-specific conditions.

WILDLIFE

This project spans Late Successional Reserves (LSRs) and through Activity Centers and Critical Habitat for the Northern spotted owl, which often use significantly burned patches for foraging if they are unlogged. A surprising number of spotted owl sites continue to be occupied and reproductively

successful after experiencing fires of all intensities.⁵ Further, spotted owls utilize complex early seral forests for foraging, providing evidence that severely burned forests can benefit spotted owls. While timber sales are subject to seasonal restrictions during the owl's breeding season, that does nothing to mitigate the destruction of the owl's habitat. If any trees that are cut in LSRs are to be sold commercially, an analysis on impacts to northern spotted owls and available dead wood habitat is required by the Northwest Forest Plan and the northern spotted owl's recovery plan. In the final decision for this project, please also address consultation and seasonal restrictions (i.e. northern spotted owl);

Due to large losses to northern spotted owl and red tree vole habitat the Forest Service should use its own reference materials for identifying trees for removal which indicates that Douglas Fir > 20" diameter at breast height should be retained to the maximum extent possible so that they may become habitat trees for species such as northern spotted owl and red tree vole.

Additionally, the DEA does not analyze current condition or effects to red tree vole or their habitat as a result of the proposed project and we encourage the CRRD to include an analysis for red tree vole in the final EA.

CULTURAL RESOURCES

Throughout history, riparian corridors, ridgelines, and numerous areas that are now roaded have always been desirable for habitation and livelihood for humans. Intact and/or buried structures, buried artifacts, culturally modified trees, burial sites, and habitation sites are all present within the CRRD. Some are currently known, and more are yet to be uncovered. Riparian corridors especially have been highly restricted in the past, regarding logging and development. Changing the time scale of tree abatement on the CRRD to a longer and more thoughtful approach (as it has been changed to) will likely result in limiting soil disturbance to less area, and hence limit the potential disturbance of undiscovered artifacts or other cultural sites. We're encouraged by the PDC's specific to cultural resources and encourage meaningful engagement with affected Tribes throughout project planning and implementation.

CONCLUSION

The National Forest Management Act and other law, regulation, and policy advise that multiple uses are allowed only if those uses do not compromise the

⁵ USFWS 2011. Revised Recovery Plan for the Northern Spotted Owl.
<https://www.fws.gov/oregonfwo/Species/Data/NorthernSpottedOwl/Recovery/Library/Documents/RevisedNSORecPlan2011.pdf>

ecological integrity of the system that sustains the other uses. The USFS is legally and morally obligated to maintain the ecological integrity of forest systems in the face of their multiple-use directive. As noted in previous comments, the ecological effects of post-fire logging are overwhelmingly negative and could compromise the CRRD's ability to retain and sustain adequate amounts of those special attributes that severely burned forests provide. Therefore, again, we appreciate your utmost care and patience in the planning and implementation of this project.

We anticipate your review of these comments and look forward to the learning about any developments or changes made to both the forthcoming decision and the project itself.

Thank you,

A handwritten signature in black ink that reads "Cara Christofferson". The script is cursive and fluid, with the first name "Cara" and last name "Christofferson" written in a single continuous line.

Cara Christofferson

Forest Policy and Advocacy Coordinator, Bark