

Submitted electronically on August 25, 2022 via project website under “Comment/Object on Project”

To: Meta Loftsgaarden, Forest Supervisor
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

Subject: 36 CFR 218 objection of the Clackamas Fires Roadside Danger Trees Project

In accordance with 36 CFR 218, I object to the Environmental Assessment and Draft Decision Notice and Finding of No Significant Impact for the following project:

Project:

Clackamas Fires Roadside Danger Tree Project

Objector:

Molly McKnight

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Forest Service Responsible Official:

Curtis Booher, District Ranger, Clackamas River Ranger District

Objection Reviewing Officer:

Meta Loftsgaarden, Forest Supervisor, Mt. Hood National Forest

End of Objection Period:

August 29, 2022

Project Location:

Mt. Hood National Forest
Clackamas River Ranger District
Clackamas County
Oregon

Proposed Actions:

- Approximately 232 miles of roadside danger tree cutting
- 9 miles of road decommissioning
- 32 miles of road closures
- 3.5 miles of other road operational maintenance level changes

Project Issues and Components to Which This Objection Applies:

In my comment letter dated May 18, 2022, I expressed a concern about the closure of a few particular roads being detrimental to recreational opportunities in this area at a time when recreational access and opportunity on the Mt. Hood National Forest is declining and demand is increasing. Closing these roads would prevent motorized access to a popular viewpoint and one lesser-known viewpoint, reduce dispersed camping opportunities, and in one case close an access point for a well-known and frequently used unmaintained historic segment of Memaloose Lake Trail #515. In my comment letter, I requested a reversal of the decision to change operational maintenance levels on these roads from ML 2 (as recommended in the 2015 Mt. Hood National Forest Travel Analysis Report, otherwise known as the TAR) to ML 1 (resulting in closure to motor vehicle access) for the following roads/road segments:

4540-140: the entire .82 mile length

4540-150: the approximately .25 mile length from road 4540 to the start of the 4540-160

4540-160: the entire .37 mile length

As I stated in my comment letter, I support the majority of the project, but I still feel strongly that these roads should remain open for public motorized access in light of the decline of a variety of recreation opportunities on the Clackamas River Ranger District due in part to the recent large fires.

Recreation Access and Opportunity on the Mt. Hood National Forest

On page 36 of the 2015 TAR, accessibility of the Mt. Hood National Forest from the Portland metropolitan area and local communities was highlighted, mentioning that the Mt. Hood National Forest provides recreation opportunities for local residents and visitors from around the world. It mentions that the existing transportation system provides access to a variety of dispersed and developed recreation facilities and areas, trails and trailheads, scenic landscapes, and special areas, including wilderness. **The TAR states that the 2011 National Visitor Use Monitoring study on the Mt. Hood National Forest found that the top five activities visitors identified participating in were: downhill skiing, relaxing, viewing natural features, hiking/walking and driving for pleasure. The TAR also states that as the transportation system changes, the impact to recreation access should be considered.** As a former recreation manager of the Clackamas Ranger District in the early 1990's, I heartily agree.

Over the past few decades, the Mt. Hood National Forest has closed many hundreds (if not thousands) of miles of roads in order to protect natural resource values in the face of steeply declining road maintenance budgets. In most cases I understand and agree with these closures, although I have concerns about the cumulative impacts of increasingly limited access for both the public and for Forest Service staff, particularly during wildfire events.

Driving for pleasure to view scenic landscapes and special places has become increasingly popular. I would guess that the pandemic has accelerated this as covid has limited other recreation activities for some people. At the same time, roads on the Mt. Hood National Forest have fallen into disrepair and a significant percent of road miles have been closed over the past few decades. Scenic viewpoints where one can look out over a vast forested landscape have

become harder to find as timber harvest has declined. The fires of 2020 and 2021 will have certainly opened up some views along mainline roads, but many of these views in the near term and at least in the foreground will be of burned forest. There are not many high peaks which can be accessed by the public with motorized vehicles. **Motorized vehicle access is very important for some groups of people including those less physically able to hike up and down steep slopes on uneven ground like seniors, children, and disabled people.**

As I stated in my comment letter for this project, I am concerned that due to so many campgrounds being burned over in the 2020 and 2021 fires, demand for dispersed camping will increase on the Clackamas River Ranger District at a time when many of the few remaining spur roads in some areas are being closed. From my many years of working on the Mt. Hood National Forest, I know that people generally do not enjoy dispersed camping along mainline roads, but they seek out wide spots along or at the end of spur roads. That opportunity has been dramatically reduced over the past few decades of road closures and closure/rehabilitation of dispersed sites in close proximity to rivers and streams. Closer to the population centers of Estacada, Colton and Molalla along the west-central forest boundary, the LaDee Flat area is dominated by off-highway vehicle use, which can be noisy and attract large groups. This makes the upper South Fork area a place where people can dispersed camp, hike, and drive without the potential noise and use conflicts that off-highway vehicle use can cause.

As I mentioned in my comment letter dated May 18, 2022, the fires of 2020 and 2021 also burned miles of developed trails on the Clackamas River Ranger District. Some of these trails are in designated wilderness areas and some outside of wilderness. Some of these trails may become unusable due to continued slides (I am thinking about the Clackamas River Trail), and others may take quite some time to rehabilitate for public use. The trails that had little or no fire near them will certainly experience more heavy use once they are accessible to the public, so providing trailhead access to these less impacted and unburned trails will be important. This brings me to more specific information about the few roads I object to closing.

Forest Road 4540-140: South Fork Mountain

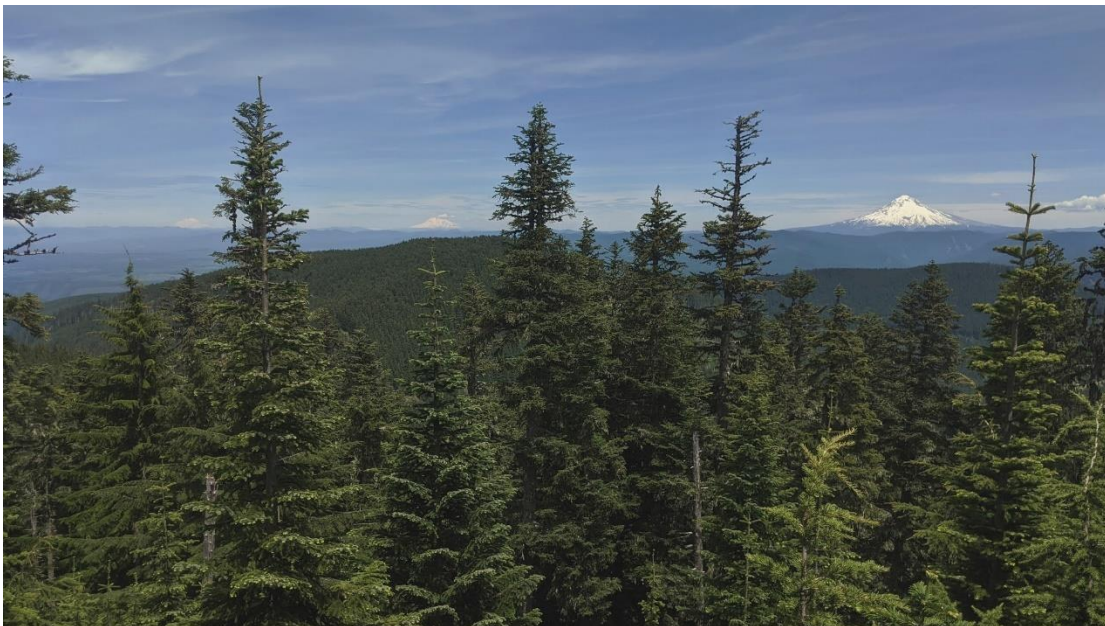
South Fork Mountain Viewpoint

This .82 mile road accesses South Fork Mountain, the was the site of a fire lookout from 1925 to 1960 (pictured here). The concrete pylons can still be easily found. From the end of this road, on a clear day one can see the following Cascade mountain peaks: Mt. St. Helens, Mt. Rainier, Mt. Adams, Mt. Hood, Olallie Butte, Mt. Jefferson, Three Fingered Jack, Mt. Washington, and Three Sisters. That's far more major mountain peaks than one can see from Larch Mountain or Timberline Lodge! I was last there in 2017 when we drove visitors from the United Kingdom up there to see the view. Now that the trees at the end of the road have burned, it will be even easier to see these nine mountain peaks from this spot.

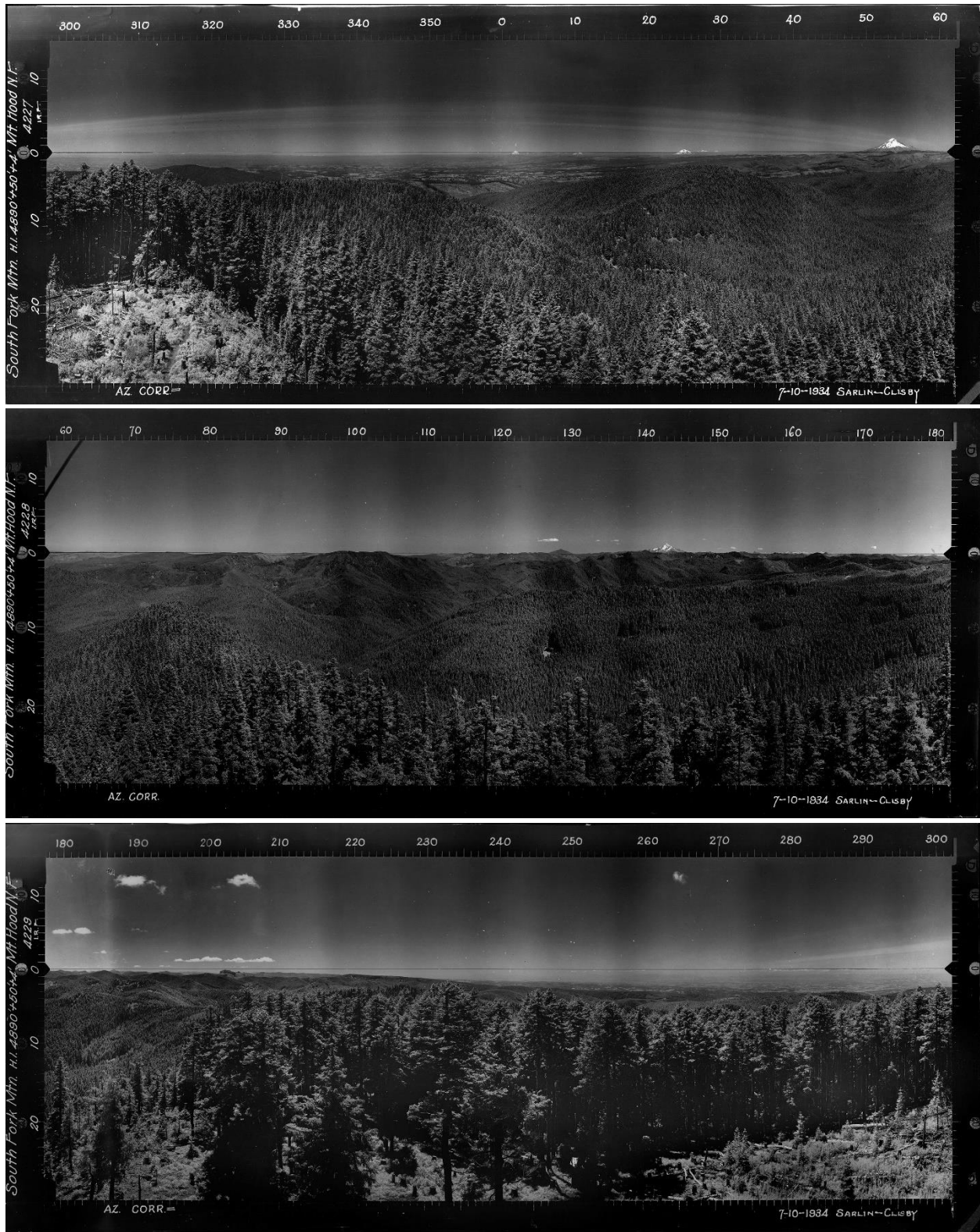




This aerial photo from Google Earth was taken in summer 2021. Trail locations I drew in are very approximate. One can see the patchy nature of the Riverside Fire burn in this area and that the old growth to the south of Memaloose Lake where the trail is located is largely unburned.



This is a photo taken to the north from South Fork Mountain that was posted in July 2020 on hikingindepth.com in a blog titled "South Fork Mountain via Memaloose Lake". I believe you can see Mt. St. Helens, Mt. Adams, and Mt. Hood and that Mt. Rainer is obscured by a tree.



These are Osborne photos taken from the top of the South Fork Lookout in 1934. The numbers at the top refer to the azimuth with zero being north and 180 being south. Original Osborne photos, taken from fire lookouts around the Pacific Northwest in the early 1930's, are stored at The National Archive in Seattle. I copied these from The Nature Conservancy website. The mountains appear so small because of the extremely wide format of these panoramic photos. They are larger in person.

At 4,852 feet in elevation, Fish Creek Mountain is one of the tallest peaks in this area of the District. For comparison, Goat Mountain is 4,206 feet in elevation. Of course, if the 4540-140 road were closed, people physically fit enough could either walk up the .82 mile road or hike the approximately 2.3 miles up from the Memaloose Lake trailhead. For less physically capable people, the only way they can experience this spectacular view is to drive up the 4540-140 road. **A statement was made in the draft Decision Notice that “the area could still be accessed by foot on the existing road prism”. This is not true for everyone. The TAR stated that comments received included people making the case to provide access for those who may not be able to hike into the forest.** I know several retired Forest Service employees who live in the Estacada area and are no longer able to hike up steep trails who said they would love to be able to drive up to South Fork Mountain to take in the views. There are not many (if any) high points that I know of on the Mt. Hood National Forest which the public can drive to and see nine Cascade mountain peaks from one spot. There is Timberline Lodge, but one can only see the peaks to the south from there. Even the famous view from Larch Mountain in the Columbia River Gorge National Scenic Area requires a hike and one can only see a few peaks. There is an opportunity for the Mt. Hood National Forest to actually highlight this viewpoint as a recreation destination for everyone, including disabled people, although I realize that is not likely to happen in the near term. I feel it is a good idea to keep this option open for the future.



The spectacular view from the top of South Fork Mountain is highlighted on many hiking websites. This photo of Mt. Jefferson from the top of South Fork Mountain was on the nwhiker.com website page describing the Memaloose Lake and South Fork Mountain Hike.

Memaloose Lake Trail #515

Most of the hiking websites with entries for the Memaloose Lake Trail #515 call it some combination of the Memaloose Lake and/or South Fork Mountain hike and discuss the option to continue the approximately one-mile unmaintained trail past the lake up to South Fork Mountain to take in the spectacular view. In fact, some websites like OregonHikers.org refer to the entire hike as the South Fork Mountain hike instead of the Memaloose Lake hike. I hiked this trail several years ago and like many others, my group of Forest Service coworkers opted to continue past the lake to take in the views from South Fork Mountain. We were impressed!



This photo from a 2020 post on hikingindepth.com shows the sign located near the outflow of Memaloose Lake pointing the way to South Fork Mtn with the words “trail not maintained” in smaller letters below.

A 1916 map of the Forest shows a trail up to “South Fork Mtn Lookout” continuing down to Memaloose Lake, so this section of trail is very old, in fact I would suggest it is a historic/cultural/heritage resource. A lookout person stationed there probably had to hike down to the lake to get water back in the days before the 45 road was built. The 1916 map shows a ranger station called Cold Springs Ranger Station located not far south between South Fork Mountain and Dead Horse Butte which was accessed via a trail coming from the Dodge area to the north. It could be that the ranger stationed there used South Fork as a main place to spot fires. A 1966 map shows this section of trail labeled as #515 and it is labeled as that for several decades. At some point a decision was made to abandon maintenance on this historic section of trail, but I do not know the reason. Despite this, **the Mt. Hood National Forest website (pretty much like all of the PNW hiking websites) currently mentions the option to hike this unmaintained section of trail to the top of South Fork Mountain to take in the views.** Here are examples of that.

From the current Mt. Hood National Forest website page describing Memaloose Trail #515: “This trail begins at Forest Road 45 (3,440’) and ends at Memaloose Lake (4,080’). The trail climbs gradually for 0.8 mile to a series of switchbacks. Continue uphill another 0.4 mile to Memaloose Lake. Head left, cross the outlet, and you’ll find several campsites. If you wish to climb South Fork Mountain, continue straight on this unmarked, unmaintained trail 1 mile to the summit.”

From the current Mt. Hood National Forest website page describing Clackamas Wilderness: “A popular hike in the Clackamas Wilderness is the trail to Memaloose Lake. It climbs through an old-growth forest 1.4 miles to the lake, and then continues a mile up to a viewpoint atop South Fork Mountain. The word memaloose means "dead" in Chinook jargon, the old Indian trade language of the Northwest. The old-growth forest around the lake is a rare example of mature forest habitat surrounded by lands that have been historically logged.”

Although the Forest Service asserts in the Environmental Assessment and Decision Notice that trail #515 ends at Memaloose Lake, even the map included in the Environmental Assessment shows it going beyond the lake up to the end of the 4540-140. Several of the hiking websites noted that this is a popular trail, and with the loss of other trails due to recent fires, it will likely become more popular once vehicular access to the 45 and 4540 roads is opened. Leaving the 4540-140 open allows for the possibility of a downhill one-way hike if a group has two cars. One car can be parked at the official Memaloose Lake Trailhead on road 45, and then the second car could be driven using the 4550 to the 4540 to the 4540-140 up to the top of South Fork Mountain to start a downhill hike.

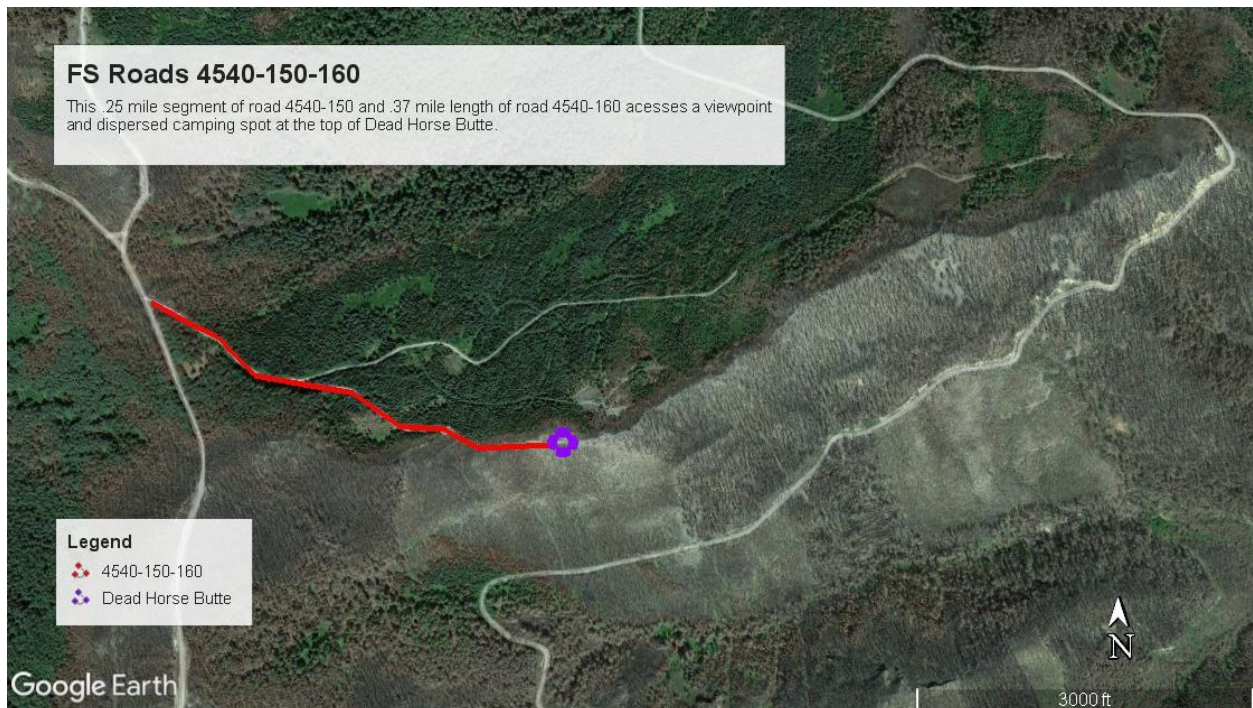
I suggested in my comment letter dated May 18, 2022 that the Forest Service might consider making this unmaintained section of trail a part of the “official” #515 trail. I didn’t necessarily mean right at this time with this project. As I mentioned in my comment letter, I think that keeping the option open might be a good idea in light of the loss of so many miles of other trail in the recent fires. **In the draft Decision Notice, one reason given for deciding against keeping this road open is that “addressing hiking trails, hiking opportunities, and recreation infrastructure is outside the scope of this project”. I think that leaving this road open to maintain the status quo ML 2 and preserve future options to restore this historic trail section actually is within the scope of this project. As the TAR noted, as the transportation system changes, the impacts to recreation access should be considered. Making a decision now to close this road and so many others in this area certainly affects recreation access, and in 2015 the TAR recommended that they remain open.** One of two changes in the draft Decision Notice to the proposed action in this Environmental Assessment is to keep a portion of a road open because it accesses a trailhead for the Rimrock Trail #704, so recreation access is already being used as a reason to change a decision. Prior to the fires, the top of South Fork Mountain was used first as an official and then as an unofficial trailhead for years. During my time working with Clackamas County and Dump Stoppers, I visited the top of South Fork Mountain many times to find one or a few vehicles parked there with no people in sight and assumed they were hiking the trail. Yes, we did occasionally see some trash there but did not encounter significantly large dump sites as those tend to happen in the South Fork Mountain Rock Pit to the north. I did occasionally see people camping at the end of the road and remember chatting with people about the great view.

Other Recreation Opportunities on South Fork Mountain

As I mentioned in my comment letter, I am concerned about the effect of closing so many spur roads on the availability of suitable dispersed camping sites. From my time with Dump Stoppers, I know that the end of the 4540-140 has been used as a dispersed camping site. It is wide and flat enough to park a few vehicles and set up some tents. This site is high and dry with no concerns for riparian areas. My friend who used to be the Heritage Resources Technician on the Clackamas River Ranger District said it was also a known huckleberry picking area, although we will have to see if they recover after the fire. There are fire lookout history buffs who enjoy visiting the sites of lookouts, even ones that no longer exist.

Forest Roads 4540-150-160: Dead Horse Butte

It is apparent in the draft Decision Notice that there is a misunderstanding of my request concerning these roads. I did not ask that the entire length of the 4540-150 be left open, rather just the approximately .25 mile section between road 4540 and the beginning of the 4540-160. Instead of asking to leave the entire 1.75 miles of both of these roads open, I requested that .25 miles of the 150 spur and the .37 miles of the 160 spur be left open for a total of .62 miles (shown in red in this aerial photo view), only about 1/3 of the misunderstood length.



This aerial photo from Google Earth was taken in summer 2021. There is a large, flat graveled turnaround at the end of the road which I would guess has been used as a dispersed site and hunting camp. One can clearly see how south-facing slopes burned very hot while north-facing slopes sometimes sustained less burn damage during the Riverside Fire of 2020.

Dead Horse Butte Viewpoint

In the comments I submitted, I suggested that access to the end of the 4540-160 spur near the top of Dead Horse Butte be left open as it offers a view into the Fish Creek drainage. The draft Decision Notice states that a viewshed analysis showed limited opportunities to create or enhance scenic viewpoints due to topographic features. I disagree. At 4,472 feet in elevation, from Dead Horse Butte one can look east and see much of the western slope of the 5,100 foot Fish Creek Mountain and upper Fish Creek basin that lies between them. One can see from Google Earth's ground-level view function that from the end of the road and within a few hundred foot stroll along the ridge, in the foreground one could see the headwall areas and into the drainages of Music Creek, Pick Creek, and Shovel Creek, and further out one could see the lower reaches of Fall Creek and Wash Creek, plus an upper portion of the main stem of Fish Creek itself and many of the tributaries on the east side of Fish Creek. You can also see Mt. Hood and Mt. Jefferson and I think a few other Cascade peaks in the distance. It could be beneficial to have this vantage point from which to view fire recovery in the upper Fish Creek watershed. This could even be considered in the future to be a good interpretive site.

Dead Horse Butte Dispersed Recreation Site

As I previously stated in my comments and within this objection, I am concerned about the cumulative effects of closing so many spur roads on access to suitable dispersed recreation sites. The area at the end of the 4540-160, while now denuded of trees, appears to be a well-used campsite which I suspect may have been attractive in part due to the views from this point. On Google Earth, one can even see what appears to be a rock fire ring. This project will close almost every other spur road in this area that was open prior to the Riverside Fire at a time when the burned campgrounds along the Clackamas River and at Olallie Lake will result in increased demand for dispersed camping on the district. **The statement in the draft Decision Notice that "motor vehicle-accessible dispersed camping opportunities throughout the District and the Forest remain available" may be true, but they are harder to find. It is not true for some fairly wide swaths of the Forest including this area once this project shuts down the rest of these spur roads.**

Cumulative Effects of Road Closures on Access to Dispersed Camping in the Area Accessed via Roads 4540, 4545, and 4550

I disagree with the statement on page 38 of the Environmental Assessment regarding effects to dispersed recreation that "given that the miles of road proposed for decommissioning and closure makes up 4 percent of the total existing roads on the District (1,000 miles), effects would be minimal because access would become available as danger trees are cut and roads are opened." The cumulative effects of this decision plus prior decisions to close spur roads in the area accessed by the 4540, 4545, and 4550 roads will essentially eliminate almost all suitable dispersed camping sites from many square miles of the District at a time when demand has increased due to the recent fires.

Of twenty-two spur roads off of main roads 4540, 4545, and 4550 that were designated as ML 2 by the TAR, nineteen are now proposed for closure with this Decision Notice as either ML 1 or decommission. Of the three are not proposed for closure, one is the .08 mile spur that accesses

South Fork Rock Pit. The second is the 4545-011, a .07 mile spur that I couldn't even find on the map and which I suspect will be functionally closed by closure of the road from which it originates. The third is the 4540-210, a .94 mile road that is the only road access to an isolated section of unburned Forest Service land in a different watershed to the west. **This project will essentially close the last of the spur roads in a large area of several square miles of the upper South Fork and upper Fish Creek watersheds, eliminating access to the already few suitable dispersed camping sites left in this area. This project will close 11.36 miles of TAR-designated ML 2 spur roads out of a total of 12.45 miles of open ML 2 spur roads, closing down 91% of the open spur road miles in this area which is a great reduction in dispersed camping availability in a large area of the district.** The 4540, 4545, and 4550 roads will become virtually the only access roads for several square miles of the district.

Pages Four-36 and Four-37 of the Mt. Hood National Forest Land and Resource Management Plan describe forest management direction for dispersed recreation. Dispersed recreation opportunities on the Mt. Hood National Forest have been declining in number in large part due to road closures. **In my opinion, South Fork Mountain meets the definition of a "Special Place" as described on page Four-37 of the Mt. Hood National Forest Land and Resource Management Plan. This has been a known viewpoint for over a century with trail access down to Memaloose Lake. I believe as a "special place", the vehicle access to the top of South Fork Mountain that has been available for decades should not be eliminated.**

Some Mt. Hood National Forest forest-wide standards that I believe this decision may be inconsistent with or warrant further consideration include:

FW-443 Segments of older/abandoned/historic trails identified in trail plans may be incorporated into the development of trail systems and/or new trails.

FW-453 A broad spectrum of year-round dispersed recreation opportunities experiences and settings shall be provided where they are not in conflict with Management Area management direction.

FW-454 Segments of older/abandoned/historic trails identified in trail plans may be incorporated into the development of trail systems and/or new trails where there is a demonstrated demand.

FW-461 Management prescriptions shall be developed for each identified and designated Special Place site during project analysis.

Resolution Requested

I request that the Deciding Official choose to leave road 4540-140 at ML 2 as designated in the 2015 TAR in order to provide vehicular access to a special viewpoint on top of South Fork Mountain, a dispersed campsite, and a historic and well-known trail segment which connects to Memaloose Lake Trail #515. I also request that the first approximately .25 mile of road 4540-150 and the .37 mile of the 4540-160 be left at ML 2 to provide access to a viewpoint and a dispersed campsite on top of Dead Horse Butte. Both sites could be potential future interpretive sites which feature wide landscape views closer to communities on the southwest side of the Mt. Hood National Forest.

- Leaving these roads open would continue to allow public motorized access to two viewpoints, one which is quite well-known for the spectacular view of nine major Cascade mountain peaks. This would be appreciated by less able-bodied people so they could also see this view without having to hike.

- In the case of the 4540-140 road, it would also maintain an access point to the well-known unmaintained extension of the Memaloose Lake Trail at a time when many trail hiking opportunities on the Clackamas River Ranger District have recently literally gone up in smoke.
- It would allow access to a few suitable dispersed camping sites at a time when almost every other spur road in this area will be closed.
- Reversing these closure decisions would result in approximately 1.44 miles of road remaining in ML 2 (as recommended by the 2015 TAR) instead of changing to ML 1, reducing the project total of road closures from approximately 32 miles to 30.6 miles.
- It would add something less than 1.4 miles of roadside danger tree removal due to the fact that only some portions of these roads have burned trees in close proximity (as seen on the new 2021 aerial photos on Google Earth).
- None of these roads cross riparian reserves. These roads are “high and dry”, not particularly steep or windy, and should be relatively inexpensive to maintain.

Request for Resolution Meeting

Pursuant to 36 CFR 218, I request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution.

Thank you for your efforts on this project and consideration of the issues I raised in my comments and in this objection. I look forward to a resolution meeting. Please contact me using the contact information I included at the beginning of this letter to arrange a date and time for the resolution meeting. I will be out of the state from September 1 through September 11 with electronic access limited to what I can do on my smart phone.

Sincerely,
*/s/ Molly McKnight

Photo of me (in front) with visitors from the UK in 2017 at the top of South Fork Mountain with Mt. Hood in the background. The group consisted of a PhD student from the University of Wales, his professor (who is former Mt. Hood National Forest ecologist Cynthia Froyd), and a friend who were here doing field work for the PhD student's dissertation.



*Signature can be provided upon request.