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RE: Mt. Hood National Forest Wild and Scenic River Values Report 2018

Bark's mission is to bring about a transformation of public lands on and around Mt. Hood National Forest 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's supporters depend on the public lands surrounding Mt. Hood, including areas evaluated by this report, for a wide range of uses including, but not limited to: swimming, fishing, rafting, nature study, wildlife observation, non-timber forest product collection, spiritual renewal, and other recreation. We submit these comments on behalf of our 25,000 supporters.

We submit these comments in an effort to improve the Forest Service's understanding of these important rivers and their watersheds, and the subsequent development of the Comprehensive River Management Plan for Mt. Hood National Forest. Bark supports the Mt. Hood National Forest Service's efforts to develop comprehensive river management plans for the Collawash River, Eagle Creek, East Fork Hood River, Fifteenmile Creek, Fish Creek, Middle Fork Hood River, South Fork Clackamas River, South Fork Roaring River, and Zigzag River. With a large number of stream miles heavily impacted by past logging, roading practices and other human alterations, much work remains to reestablish fully functioning riparian and aquatic ecosystems across the Forest that will

exist in perpetuity, especially as human demands for recreation and water continue to grow along with the surrounding population and the effects of climate change.

It seems important that the Forest Service **include a summary of past, present and future barriers to the Outstanding and Remarkable Values** identified in this report such as climate change, road density (incredibly high in the Collawash), geologic/hydrologic volatility (incredibly high in Fish Creek), history of logging (prevalent throughout all watersheds), proposed and future logging projects, and recreational use. Lawful and unlawful off-highway vehicle use can adversely impact streams through compaction of soils, erosion and sediment delivery. Recreation and campsites near riparian areas are especially susceptible to alterations in natural vegetation and bank stability.

For example, the entirety of the Collawash Watershed has been so affected by roads that the entire watershed is already far outside of its “natural range of variability” for sedimentation. As noted in the Increment 2 EA:

Currently there is a greater amount of sediment production and delivery sites than what existed under the reference sediment regime. Many upland forested sites that were not sediment sources in the past are now sites of chronic production; most can directly be attributed to roads. Pathways for sediment transport have been expanded by road related drainage.

The impact of roads on the watershed has negatively impacted the development of Wildlife, Scenery, and water quality ORVs on the Collawash River and Fish Creek. Prohibiting future road construction in these corridors is consistent with existing and proposed Key Watershed designations and the outstandingly remarkable values for which Congress designated the streams. Roads create disturbances on the landscape that are not replicated by natural factors. Bark urges the Forest Service to plan according to how these rivers *could be* with greater protections, not just for maintaining the current conditions.

The Forest Service as a whole acknowledges that “[p]roviding cold, clear waters of high quality” for both “aquatic organisms and human use is probably the proper focus for managing water on the National Forest System,” recognizing that clean water benefits both humans and other species. As ninety-eight percent of the forest is somebody’s drinking water supply and the Forest provides a domestic water supply for 1.1 million people as well as an industrial supply for numerous businesses and enterprises; **Bark recommends the Forest Service adopt Water Quality/Drinking Water Resource as an ORV**, quantify impacts to drinking water supplies and ensure engagement from municipal water managers in the planning process. Water quality is closely associated with the intensity of forest management activities and resulting effects on riparian vegetation.

As all of the Wild and Scenic Rivers on Mt Hood National Forest will be impacted by climate change including shifting precipitation patterns, diminished glacial contributions, and increased demand for drinking water and recreation access; **Bark recommends the Forest Service adopt Climate Resiliency/Climate Benefits as an ORV.**

Bark has determined that the River Values Report (RVR) does not align with Title 36 of the Code of Federal Regulations. While the RVR precedes the development of Comprehensive River Management Plans, not an LRMP, Bark is concerned that inconsistencies between the assessment protocol for these two types of Management Plans may negatively impact the long overdue revision of the Mt. Hood LRMP. **Bark requests that the River Values Report be augmented to include an assessment of the impact of climate change on the ORVs, a baseline assessment of carbon stocks within the Wild and Scenic River corridors as well as climate benefits people obtain from the NFS planning area (ecosystem services), and generally bring this planning process into compatibility with the requirements of 2012 planning rule for National Forest System land management planning.**

Additionally, Bark understands that many of the confirmed Outstandingly Remarkable Values are the result of the relative protection provided by the Northwest Forest Plan

(NWFP) on the landscapes of the Wild and Scenic Rivers of Mt. Hood National Forest. Therefore, Bark recommends that determination of *exceptional* qualities be derived not from a comparison of rivers included in the area of the NWFP, but from a comparison of free-flowing rivers on both public and private lands beyond the region of the NWFP.

Finally, Bark recommends the Forest Service maintain the eligibility of stream segments previously found eligible. The 1990 Plan found the North Fork of the Clackamas River and a 10-mile segment of the Oak Grove Fork of the Clackamas River eligible for designation under scenic or recreational classifications. The MHNH should maintain these streams' eligibility, include these streams in the Comprehensive River Management Plan and refrain from management activities that degrade the outstandingly remarkable values previously recognized. This is consistent with the Oak Grove Fork's Key Watershed designation and Bark's recommendations for roadless area protections, such as those found at the headwaters of the North Fork of the Clackamas River.

We hope this planning process will set a strong standard for comprehensive assessment and exceptional protective management of Mt. Hood's Wild and Scenic Rivers.

Sincerely,



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Collawash River, Mt. Hood National Forest