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Comments: The Clackamas River Ranger District of the Mt. Hood National Forest (the Forest) is developing an environmental assessment to evaluate the status of National Forest System roads and danger trees within the areas affected by recent wildfires, which include the Riverside, Lionshead, and Bull Complex Fires. Portions of the Forest affected by the fires are currently closed to public access due to the dangerous conditions and the abundance of burned trees that are falling and likely to continue to fall from decay and storm events.

The purpose of this project is to do an additional assessment of fire-caused safety and access issues so that roads can either be safely opened for public and administrative access, closed with effective barriers, or decommissioned. The proposed action includes the following elements:

Cut danger trees along approximately 200 miles of open roads.

In terms of striking distance, the proposal regarding tree-heights will be based on site-specific circumstances.* I acknowledge that the Forest Service has dealt with many obstacles related to reopening the forest and applaud your commitment to do a full environmental analysis of the current road system and the roadside abatement being considered there. I believe you have an opportunity here to reexamine the ecological impacts of forest roads that are exacerbated by recent fires, especially impacts to salmon and drinking water. The Mt. Hood National Forest road system is oversized, and the agency did not have funding to maintain it even before the fires. Reducing the open road network could address economic and ecological challenges the agency faces.

* Danger tree removal would not make sense on roads that are currently closed or decommissioned, have previous decisions to be closed or decommissioned, or on roads identified in the analysis for future closure or decommissioning

* In terms of "striking distance", the proposal regarding tree-heights will likely be based on site specific circumstances. This is a good way to move forward as long as those circumstances are discussed in the analysis with Project Design Criteria.

* 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. Furthermore, this project spans Late Successional Reserves and Critical Habitat for the northern spotted owl, which often use burned patches for foraging. A full analysis on current and proposed impacts to wildlife and available habitat should be completed before this project is approved.

* Maintaining access to cultural resources requires meaningful consultation with the Confederated Tribes of the Warm Springs and the Confederated Tribes of the Grande Ronde. Mt. Hood's management plan provides direction on honoring treaty rights, and traditional areas that are covered by the American Indian Religious Freedom Act.