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Clackamas Stewardship Partners (CSP) public comment on Mt. Hood National Forest, Stone Creek Vegetation Management Project:

Thank you for the opportunity to comment on this project proposal. The CSP understands this project and draft Environmental Analysis (EA) has been designed primarily as a forest health project. We appreciate that the Forest Service is taking a diverse approach that goes beyond a conventional commercial thinning project of mainly thinning second growth forest.

CSP understands that the Forest Service has been in contact with the Confederated Tribes of Warm Springs and CSP supports outreach to the Tribes on these ceded tribal lands and tribal rights to use these lands and have a say in their management.

**Fire and forest fuels:** Dealing with fire risk and fuels management is a big part of this proposal including the use of prescribed fire. The project's plan to include low intensity, broadcast burning in the understory near the Forest boundary and at other locations is a positive approach that CSP supports when done carefully.

Stone Creek watershed is a landscape where fire was historically more frequent before fire suppression in past decades became the paradigm for fire management. Growing scientific evidence of climate change moving toward warmer temperatures, also supports efforts to better deal with increasing fire frequency and an unnatural abundance of fuels from past fire suppression.

The project proposal for roadside fuel treatments of understory ladder fuels along some of the more heavily used roads, can be a positive approach for fire risk. These same roads receive the heaviest public use and overnight dispersed camping in the project area. Human caused fires have been one of the primary reasons for wildfires in general and some of the largest fires on the Clackamas River Ranger District. Also, since the project plan is treating roadsides, the nearby significant cultural and recreation resources of Clackamas Lake Campground, the Clackamas Lake Historic Ranger Station, and the Joe Graham Horse Camp would be better protected under this EA proposal.

Within our group there is some concern about the proposal to, during snowpack, burning fuels that exist in tree wells. A similar approach was done years ago in a Rocky Mountain National Forest in early spring with abundant ground fuels, where snow was still in the unit and snow drifts present in places. Most of the slash burned too hot near the trees and trees were lost despite cold conditions and fuels being pulled back from the tree trunks.

Perhaps this could be done initially on a small number of trees to ascertain effectiveness before expanding to a larger area.

**Road Management in the project area:** Overall the road management issues are being addressed in the project area with the many open roads. Twenty miles of open road are being proposed to be closed via changing administratively to a Level-1 Maintenance Level. Currently these roads are open roads at Level-2 Maintenance. The change to Level-1 would close the road to vehicles but with storm water treatments to stabilize the roads and limit erosion. CSP supports these efforts which would protectively mothball these roads until needed in the future.

**Recommendation - augment road closures:** Because in many locations in this watershed the terrain is often flatter and relatively gentle, 4x4 vehicles can often circumvent a single discrete closure by driving around a berm or gate and make a route through the trees. CSP recommends that on flatter terrain that road closures (Level-1, decommissioned, or seasonal closures) use more than one berm and/or dug in boulder berms, and extended de-compacted road surface to prevent breaching of road closures.

**Recommendation - decommissioning other roads:** CSP supports the Stone Creek Project's proposed decommissioning of two miles of system road through passive means (currently heavily vegetated). We also

advocate that the last few hundred feet of the following roads be decommissioned as well; Road 4270-360, Road 4270-361, and Road 4270-320, (east of the 42 Road). The decommissioning is needed because the very end of these roads enters into the riparian reserve (the remainder of the road segments would still be Level-1). Another road nearby, the 4270-321 should be decommissioned since it impinges on the riparian reserve in two locations.

Recommendation - dispersed recreation: Challenges with dispersed recreation sites and use in the area is not addressed with this largely forest health project. Nevertheless, heavy dispersed recreation use along Forest Road 5740 needs to be addressed in either this EA or a new proposal in the near future. Some dispersed sites in this area are relatively benign, flat, open areas away from riparian and currently do not need treatment. One heavily used area that has damaged riparian vegetation, compacted soils, and area use is slowly expanding is located where the 5740 crosses Stone Creek (seasonally dry) near the junction with the 5740-240. During the summer camping season, heavy use has now expanded to both sides of 5740. In one place vehicles are driving through the stream channel. Parts of this site could remain open to dispersed camping, if the areas closest to the riparian were blocked to vehicles and vegetation restored. While not currently part of the proposed project, the need to address this problem dispersed camping area, might be done via a future proposal that would treat similar dispersed recreation impacts found elsewhere in the Clackamas River Ranger District. It is important that impacted sites and the need for sustained maintenance (e.g., Summit Lake C.G.) should not be forgotten and allowed to degrade further.

Recommendation - culvert replacement: The 5740 Road at the junction of the 4740-261 has a partial or total culvert barrier to fish. This section of the Stone Creek, both upstream and downstream of the culvert is high quality instream habitat supporting native cutthroat trout. A large, high-quality wetland adjoins Stone Creek just downstream. A pump-chance is located immediately below the culvert. This area of Stone Creek is valuable because it is a refugium for aquatic species since much of the Stone Creek drainage becomes dry in the summer. While not a part of this proposed project currently, this important culvert needs to be replaced for fish and aquatic species passage needs.

Thank you for considering CSP's comments.

Sincerely,  
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