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Comments: To the Clackamas District Ranger and other District personnel:

I'm submitting the following comments on the Stone Creek Vegetation Management Project based on my experiences mapping wetlands and recreating in the project area, and researching the effects of climate and fire on temperate rainforests and wetlands.

I support the following aspects of the proposed project:

- *The decision to conduct an Environmental Assessment, and thus a more robust and inclusive planning process, rather than a Categorical Exclusion.
- *Collaboration with the Confederated Tribes of Warm Springs and the inclusion of management activities that draw on elements of indigenous traditional ecological and cultural knowledge (e.g., cultural burning).
- *A focus on logging in plantation stands rather than late successional reserves.
- *The inclusion of passive road decommissioning where they intersect with riparian areas, streams and wetlands; road closures and stormproofing.
- *The use of fire, rather than heavy machinery, to achieve management objectives.

I have concerns about the following aspects of the proposed project and would like to see these addressed in the Draft EA:

- *Language that supports and privileges contracting with local, experienced individuals and organizations, including indigenous partners.
- *Details about contractor oversight by USFS personnel throughout the project.
- *Actions that address and mitigate the impacts of unauthorized motor vehicle use and dispersed camping on forest understory composition, the functioning of wetlands and riparian areas, and the risk of wildfire ignitions where people recreate in wildlands.
- *A detailed map of the proposed temporary roads and descriptions of activities that will be undertaken to prevent unauthorized motor vehicle use of temporary roads and landings after treatment and before rehabilitation.
- *Descriptions of how negative impacts to soils, plants and waterways will be prevented during the use of heavy machinery by contractors in instances where commercial thins intersect with riparian reserves (e.g., units 1342 and 1346).
- *Analysis of how prescribed burns (e.g., machinery and personnel on roads, smoke, etc.) will impact recreation and steps taken to mitigate those impacts. For example, unit 1441 is adjacent to popular recreation sites, including fishing along the Oak Grove Fork where it runs through Clackamas Meadows, and the Clackamas Lake and Joe Graham Horse Campgrounds. When will burning take place and how long are related activities expected to last?

If wetland restoration will be included in the project, please consider the following when analyzing restoration goals and activities:

- *Many of the sites labeled as "meadows" throughout the Clackamas Ranger District are actually wetlands and should be recognized as such during the management process. Wetland functioning is driven to a large degree by the extent and duration of water presence (i.e., hydroperiod). Not all wetlands are continuously wet at the surface. Some, such as Black Wolf Meadow (not in the project area, but a fairly well-known site), are only wet near the ground surface for a brief period of time early in the growing season; yet, this temporary wetness creates the conditions that drive plant species composition and diversity, including the presence of culturally-significant plants like *Camassia quamash*.
- *Any activities that alter a wetland's hydrology have the potential to change the structure (e.g., plant community composition, extent of surface and groundwater) and functioning of that wetland, including its ability to sequester

carbon or its connectivity to adjacent streams.

*Wetland type diversity should be acknowledged and sensitive and/or rare wetland types should be maintained/protected. There are 16 major types of wetland and riparian areas in Oregon and a variety of distinct wetland plant communities can be found in each. The Oregon Biodiversity Information Center has created keys and descriptions of these, including their state and global conservation statuses (see John Christy's 2017 documents on Oregon Explorer under the Wetlands topic page).

*Tools such as the National Wetland Inventory dataset (see the USFWS website for a map viewer or to download data) should be used to help identify wetland patches that might be most sensitive to changes in hydrology due to climate and/or natural or human disturbances. For example, polygons with 'D' (saturated) water regimes are likely to be peatlands (fens), which are often biodiversity hotspots, and which require year-round saturation in order to accumulate peat (fibric organic soils) and store carbon.

*Do not assume that historic beaver activity signals the need for current beaver activity. Not all wetlands need to provide habitat for beavers. Beaver occupancy is cyclical. The 'abandonment' phase, in particular, supports extensive wet meadows, which are habitats for animals and plants that may not thrive in wetter environments. Not all wetlands or wetland patches need to be covered in surface water year-round. A diversity of wetland patch types will best support a diversity of plants and animals and maintain ecosystem services both locally and downstream.

*Multiple lines of evidence should be used to examine whether wetland hydrology or vegetation is changing such that enhancement activities (e.g., beaver dam analog installation, mechanical tree or shrub removal, cultural burning, etc.) are justified to maintain/protect wetland structure and function. These should include water level monitoring across multiple seasons, analysis of shrub and/or tree encroachment (and comparison of current plant composition to known wetland plant communities), and examination of historical imagery and documentation or local knowledge.

*Ecological Integrity Assessments of wetlands should be performed to establish baseline data on wetland condition and determine whether/what management activities are needed, if any. The Washington Department of Natural Resources' website has field manuals and forms for conducting EIAs of wetlands in the Pacific Northwest.

*Since wetland dynamics change seasonally and annually depending on climate, hydrology and vegetation should be monitored before establishing management goals, as well as after completing management activities in order to avoid unintended consequences and track effectiveness.

Thank you for the opportunity to submit these comments and for your time in reviewing the material above.