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August 14, 2009

Ray Weiss
Mt. Hood National Forest
780 NE Court St.
Dufur, OR 97021

Re: Sportsman's Paradise Fuels Reduction Scoping Letter

Dear Mr. Weiss:

Thank you for the opportunity to comment on the proposed Sportsman's Paradise Fuels Reduction project. Since 1999, Bark has advocated for the ecosystems of Mt. Hood National Forest. Our mission is to bring about a transformation of 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. As of writing these comments, we represent over 5,000 Oregonians who support our mission.

We have consistently been including a recommendation about maps in our communications with the Forest Service. We feel strongly that the Forest Service should be utilizing the free service of Google Earth to allow the public more access and insight into the plans that are being proposed. The scoping notice for this project has not been listed on the Forest Service website since the public commenting period opened. We received a hard copy of both the letter and the map. Although we understand that many people still do not have regular access to computers and the Internet and rely on these mailed hard copies, we hope to see the Forest Service become more consistent in posting these documents to their national forest website. And specifically, we request that the Mt. Hood National Forest follow the lead of other national forests, such as the Umpqua and include .KMZ files of the project planning area, allowing the public to view aerial images of scope and scale for each proposed action.

Although Bark has participated in several collaborative groups in Mt. Hood National Forest, we have not been involved in the group that influenced this project. We hope to continue to be informed about the progress of this project, as we have considerable concerns for its impacts to the surrounding ecosystems.

We would like to submit the following questions and concerns that have come from the scoping letter:

Off-Highway Vehicles – One of the recommendations from the collaborative group was stated as, “Allowing access to roads for ATV use.” (pg 2, Scoping) Bark is strongly in opposition to this being included as part of a proposed action. The Forest Service is undergoing a forestwide planning process for motorized recreation use. Under that direction, roads that are currently opened, unless marked closed, would become off-limits to Off-Highway Vehicle (OHV) riders.

In addition, this recommendation falls far outside of the terms of the Healthy Forest Restoration Act and the use of collaborative groups to implement the Community Wildfire Protection Plans. There will be an upcoming Draft Environmental Impact Statement released by the Forest Service, analyzing future designations and allowances for OHV riders in the national forest. This is the appropriate opportunity for those users to weigh in on the future planning for OHV access.

The Wasco County CWPP states, under the Special areas of concern, “The use of ORVs (Off Road Vehicles) on nearby National Forest lands is a concern of some residents who feel they increase the risk of wildfire starts.” (pg 32, CWPP) Bark agrees with this concern. In the current proposal for designated areas, Sportsman’s Paradise would no longer be given contiguous access to the national forest from off-forest riding opportunities. In the Forest Service implementation of 2005 Travel Management Rule (TMR), enforcement is expected to be an ongoing difficulty.

We have consistently asked that the Forest Service cease logging operations in known areas of high OHV use, whether it is a sanctioned or barred area for users for the duration of implementation of the TMR. We have seen a correlation between thinning treatments opening the forest floor in the short term and riders who have not been given clear enforcement messages utilizing temporary spur roads and drag lines for new trail creation. We have seen this happen most recently in the 2007 Thinning and Cloak Thinning area on the Clackamas District.

Structural Vulnerability – Zone 3 received High wildfire risk ratings for structural vulnerability because of the limited road access into and out of the Sportsman’s Park and Sportsman’s Paradise subdivisions. Since the 2005 CWPP, has this road continued to receive funds to improve and maintain it? The Forest Service is conducting aggressive road reduction in the national forest and cannot be expected to provide additional fire escape routes in the form of additional roads on national forest lands. Funds that could be garnered from a commercial fuels reduction project could be put into ensuring that this does not become a need by reinforcing maintenance needs of the existing roads currently being used for fire emergency plans.

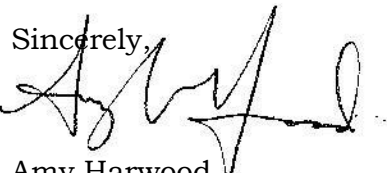
Thinning v. controlled burning – We are glad to see that the project includes a smaller portion of thinning than past fuel reduction projects. Bark does not agree that thinning will allow for long-term forest management to meet restoration goals. We are discouraged to see no mention of monitoring appraisal from the recent Sportsman’s Park fuels reduction. As HFRA collaborative groups work through the plans that were created in 2005, we hope to see each action used as a laboratory for understanding better practices for community safety measures. The scoping letter makes no mention of this nearby, relatively similar project.

With thinning comes more roads and we object to the lack of information provided about where these “few temporary roads may be constructed.” (pg 3, Scoping) It is reasonable to expect the Forest Service to provide the public with number of miles and location of temporary roads. Proper decommissioning of temporary roads in a timber project is integral to the post-logging monitoring process, whether accomplished within the agency or by the public who has stated concerns about Forest Service practices.

Biomass – Although HFRA refers to biomass as part of the beneficial repercussions, we do not agree that this programmatic shift in commercial timber resources should be implemented without a revision of the Mt. Hood Land and Resource Management Plan (LRMP). There has not been adequate analysis about whether Mt. Hood is an appropriate place to be removing biomass as a profit-driven resource.

In particular the LRMP amendments that are proposed for this project (FW-219 and FW-215) would be at the basis of any controversial discussion about the appropriate level of biomass removal for the use of energy consumption. Downed woody debris and snags are cornerstones of a healthy ecosystem structure. There is little data supporting the claims that snag creation is effective at wildlife recruitment. Snags and other decadent features must come from the natural processes that exist to be effective in restoring forests to the natural conditions. This is one of the least “renewable” components to a renewable energy portfolio and absolutely must be maintained in the future of biomass removal. We not only object to the amendment proposed, but also will encourage these standards to become “shall” statements in the upcoming LRMP revisions.

We look forward to discussing these concerns further with you. Thank you for taking the time to consider our comments.

Sincerely,

Amy Harwood
Program Director