



Clackamas
Stewardship
Partners

*Restoring the Watershed,
-Putting people to work*

Date: February 24, 2016

From: Clackamas Stewardship Partners
c/o Robert Roth, Facilitator
18683 Joyce Ct.
Oregon City, OR 97045

To: Jackie Groce, District Ranger
Jim Roden, NEPA Coordinator
Clackamas River Ranger District
595 NW Industrial Way
Estacada, OR 97023
& comments-pacificnorthwest-mthood-clackamasriver@fs.fed.us

Re: Clackamas Stewardship Partners comment letter for the Goat Mountain
Thin Preliminary Assessment

Dear District Ranger Groce and NEPA Coordinator Roden,

Clackamas Stewardship Partners (CSP) is a group of diverse stakeholders with a common goal of enhancing ecosystem health and economic viability of local communities within the Clackamas River Basin. We are committed to a collaborative process that employs stewardship contracting and other innovative tools to meet restoration goals. CSP would like to thank Clackamas River Ranger District staff for providing us with numerous opportunities to collaborate with the U.S. Forest Service (USFS) in the development of the Goat Mountain Thin Preliminary Assessment. USFS staff helped to organize and conduct field trips with CSP on July 9, 2013 and June 10, 2014, met with CSP members on April 1, 2014, and held a public meeting the evening of May 7, 2014 with many of the CRRD and Mt. Hood National Forest interdisciplinary team specialists present. From the beginning of project development in 2013, USFS staff have attended

monthly CSP meetings providing updates, answering questions, and addressing concerns raised by CSP members about the Goat Mountain Thin project. USFS staff have also been willing to discuss the project at any time with CSP members and provided the opportunity to comment on scoping letters dated March 5, 2014 and October 30, 2014. We very much appreciate your efforts to encourage collaboration including this opportunity to comment on the Goat Mountain Thin Preliminary Assessment.

CSP appreciates that the USFS considered comments submitted in a majority letter dated January 21, 2015 while developing the resource management projects which comprise the Proposed Action described in the Preliminary Assessment. CSP commented on the subjects of stand health, forage improvement and early seral habitat creation, riparian habitat improvement, temporary roads, system roads, recreational use management, economic and community benefits, and stewardship contracting. We would like to particularly commend Clackamas River Ranger District staff for proposing projects to better manage recreational uses of the area including restoring some areas that have been damaged by activities such as target shooting and Off-Highway Vehicle (OHV) riding, reshaping three rock quarries along USFS Road 45 to better accommodate recreational target shooting, and incorporating closures of some roads and skid trails into project design to prevent development of new OHV routes.

Due in part to the proximity to the Portland metropolitan area, unauthorized OHV riding in the Goat Mountain area continues to be a problem, causing resource damage such as compacted soils, rutting, erosion, de-vegetation, and wildlife disturbance. User-created trails off of established roads cause the most resource damage. We recognize that the USFS does not have the law enforcement and other resources necessary to prevent this activity, even though OHV riding is not an authorized use of USFS lands within the project area. CSP members are concerned that temporary roads and skid trails necessary for implementation of the Goat Mountain Thin could unintentionally result in the expansion of the network of user-created OHV routes. While the potential for this has been recognized in section 2.2.4 of the PA, CSP suggests that more specific discussion of how this concern will be addressed in project design and implementation should be added to the Environmental Analysis. In order to highlight concerns about potential development of additional unauthorized OHV routes, CSP

suggests the inclusion of the following elements in Goat Mountain project design criteria and project implementation contracts:

- Locating some skips along established roads that are to remain open following logging activity to provide vegetative screens that could prevent easy access by OHVs. CSP does not intend for the amount of skips already incorporated into project design criteria to increase in size or number, but simply asks that some of them to be placed next to roads that will remain open post-logging instead of somewhere else in the harvest unit. While this design feature is already mentioned in 2.2.1.1, adding it to section 2.2.4 would serve to emphasize it.
- Including requirements in the stewardship or timber sale contract for the purchaser/logger to complete the blocking (piling slash, de-compacting soils, etc) of those temporary roads and skids trails which connect to roads that will remain open upon completion of logging activity as each harvest unit is finished and prior to moving equipment away from the area.
- Requiring that blocking of temporary roads and skid trails which could be easily accessed by OHVs from open roads be done in conjunction with normal “winterization” activities such as installing waterbars in harvest units that are not completed prior to end-of-the-season equipment move-out.
- Ensuring that the Sale Administrator coordinates closely with the purchaser and contractors to achieve timely blocking of temporary roads and skid trails to prevent OHV use and inspects harvest areas to certify that adequate blockages have been created prior to authorization of equipment move-out.

CSP may also be able to work with the USFS to monitor the effectiveness of these closures in preventing the development of new user-created OHV routes. We look forward to further discussion about this potential opportunity.

CSP is also concerned about increasing frequency of wildlife poaching. The proximity of the Goat Mountain area to population centers means this is likely occurring within the project area. In addition to deterring OHV use of some areas, locating skips along open roads would also provide visual screens that may deter some poaching activity. Again, the intent is not to increase the amount of vegetation retained in skips but simply to locate some of them along open roads.

This added benefit could be mentioned in section 2.2.1.1 by adding the words “or deter poaching of big game” to the end of the third bullet. It would read:

“Skips may be placed where there are special features such as clumps of minor species, large snags, wet areas, locations of rare or uncommon species, or where needed to reduce user created OHV routes or deter poaching of big game.”

The majority of CSP members support the Goat Mountain Thin Preliminary Assessment with the addition of more specific description of project design elements aimed at preventing further expansion of the network of user-created OHV trails. CSP member organizations who chose not to sign on to this letter may either not support everything in this letter, or time constraints may not have allowed that member to gain formal support from the organization they represent. Those organizations are free to communicate their comments and points of dissention separately.

The following CSP members are in support of the contents of this letter. Please contact me or Robert Roth or if you have any questions.

Sincerely,



Molly McKnight
CSP Projects Committee Chair

Jeff Gerwing, Ph.D., Associate Professor of Environmental Science &
Management, Portland State University

Catherine C. Hamell, President, Hoodview Chapter, Oregon Hunters Association

Michael Krochta, Forest Watch Coordinator, Bark

Richard Larson, Fish & Wildlife Biologist

Molly McKnight, Natural Resources Specialist, Clackamas County Parks & Forest

Ron Schneider, Vice President, High Cascade, Inc.

Kimberly Swan, Water Resource Manager, Clackamas River Water Providers