



BARK
PO Box 12065
Portland, OR 97212
www.bark-out.org
503-331-0374

February 26th, 2016

Jim Roden
Clackamas River Ranger District
595 NW Industrial Way
Estacada, OR 97023
RE: Goat Mountain PA comments

Dear Jim,

Bark's mission is to bring about a transformation of public lands on and around Mt. Hood 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. Bark has over 25,000 supporters¹ who use the public land forests surrounding Mt. Hood, including the areas proposed for logging in this project, for a wide range of uses including, but not limited to: clean drinking water, hiking, nature study, non-timber forest product collection, spiritual renewal, and recreation. We submit these comments on behalf of our supporters.

As you know, on April 3rd, 2014 Bark submitted comments on the Goat Mountain scoping letter issued on March 5th, 2014. At this time, we requested that the agency review these suggestions as separate alternatives, which the agency can assess for economic feasibility and ecological benefit:

1. Plan road decommissioning miles in the Goat Mountain project area that do not include already actively decommissioned roads rebuilt for proposed unit access, and provide a clear implementation timeline;

¹ Supporters in this case is defined as significant donors and petition-signees which Bark has identified as being active users of Mount Hood National Forest.

2. Plan a post-implementation restoration project which has a high probability of restricting illegal activities to the degree they are restricted now or greater;
3. Remove units that would require new road construction, rebuilding of actively decommissioned roads, or log haul over rebuilt/reused stream crossings;
4. Remove units which directly border the South Fork Clackamas Wilderness area

On November 25th, we elaborated on additional details of the project for consideration, including expanding our third suggestion into three separate suggestions:

1. Remove units that would require new road construction;
2. Remove units that would require rebuilding of actively decommissioned roads; and
3. Remove units that would require log haul over rebuilt/reused stream crossings

Since this time, Bark has participated within the Clackamas Stewardship Partners (CSP) to submit a group letter on the Goat Mountain scoping letter. Bark appreciates the application of Bark's comments in developing the Goat Mtn. PA, including the consideration of additional action alternatives and more detailed analysis of road impacts and effects of logging in Riparian Reserves. Based on these responses, further conversations with the agency, and discussions within the CSP, we will focus these EA comments to the more narrow assemblage of changes we would still like to see reflected in the final decision.

UNAUTHORIZED RECREATION ACCESS

We appreciate the attention paid in the PA to mitigating unauthorized recreation uses within the project area. As you know, this was and still is a huge concern of ours related to moving forward with this project. Reopening roads that are currently closed (in order to lessen unauthorized recreation impacts such as OHV trail building, target shooting and trash dumping) can also open the door for illegal and damaging activities. We highlighted this in our original scoping comments.

The current Proposed Action includes reopening of roads which were closed through past Retained Receipts projects, and thinning in areas where illegal activity continues to be an issue on the ground.



Figure 1: Illegal OHV trail rehabilitation off FSR 4510 in the Goat Mtn project area

Some road closure and trail rehabilitation projects completed recently within the Goat Mtn. project area have been effective in reducing unauthorized target shooting, OHV use, and garbage dumping in stands proposed for thinning (Fig. 1). Restoration actions have included boulders and slash

being placed along the road, berms, obliteration, recontouring/decompacting, re-vegetating, and the removal of trash.

Illegal OHV trail-building has unfortunately persisted in the Hillockburn area of this project. There were at least two recent 2012/2013 Retained Receipts projects in the Goat Mtn. area that went through CSP to address this issue – road closures, road decommissioning, obliteration of illegal OHV trails (\$44,000 FY12, \$100,000 FY13).



Figure 2: OHV damage at Goat Mtn Unit 38, which includes additional roadbuilding

Prior to this, in 2009 and 2010 the Clackamas District used about \$60,000 in grants from Clackamas County and the Forest Service to restore 28 sites along Memaloose road. This was part of a project named “Memaloose Inappropriate Recreational Shooting Restoration Project”, and was planned in 2008.

Keeping the value of these and other past projects in mind, Bark requests that extra attention be given to unauthorized road access during the time of project implementation, and effectiveness of proposed road closures in the long-term.

Some recent CRRD projects have resulted in either non-implemented closures resulting in ecological damage (Fig. 3 & 4), breached closures (Fig. 5), or circumvented closures on both temporary roads and on roads recorded as “decommissioned” in Forest Service documents.

While Goat Mtn. is under contract, roads constructed for the project could provide unregulated motorized access over the course of multiple years, as the PA discloses that the roads will likely be needed for more than one season.

Bark requests a commitment from the agency to enforce effective barricades on roads built or rebuilt for this project when operations are not occurring. *This includes time when the area is still under contract but outside the normal operating season.*

We suggest that any final decision should mitigate potential risks associated with future road development by, 1) continuing to firmly limit construction of new roads; 2) ensuring controlled access during the project implementation; and 3) ensuring timely & secure road closure upon the project’s completion.

Recommendations for reducing impacts from unauthorized recreational use in Goat Mtn project:

In order to restrict access to temporary roads and skid trails built or rebuilt for this project when operations are not occurring (including between the normal operating seasons if work in sale unit in question is not complete in one season), please consider the following recommendations:

- Between operating seasons *and* at the conclusion of the contract, include seasonal erosion control measures such as waterbar placement, and diversion ditch creation

- Between operating seasons *and* at the conclusion of the contract, include piling slash on the first few hundred feet of temporary road or skid trail, and placing boulders at the entrance to units from main road.
- Incorporate skips to help obstruct unauthorized OHV use in thinned units. Leave a thick, “vegetated screen” along roads in areas where OHV use is expected based on past and current use. If there are areas within the units in question that would benefit ecologically from skips (such as seeps or other riparian areas), *do not* remove these in exchange for the vegetated screens, but look to achieve both the visual and ecological goals of the skips in these units.
- Provide adequate Sale Administration staffing for workload, so that coverage is available when the assigned Sale Administrator is not working.
- Require the Sale Administrator to discuss all requirements with contractor at pre-work meeting, review all pre-work discussions with contract representatives on site, and reemphasize as unit completion is eminent.
- Require inspection by Sale Administrator before contractor’s equipment is moved offsite.
- Require implementation and effectiveness monitoring of PDCs by both Sale Administrator and other specialists, including during the harvest activities.
- After project implementation and before conclusion of the contract, fully implement and monitor effectiveness of Project Design Criteria D7 from Goat Mtn. PA in order to impede further damage from unauthorized motorized access to units after thinning has taken place. However, in addition to berm, consider placement of boulders close to the main road to further deter off-road access.



Figure 3: Open temporary road into Jazz unit 30



Figure 4: Road 6311-130 reopened as part of the Jazz Thin, unregulated access damaging erosion control measures



Figure 5: Breached berm on closed road 4660-140 (closed with Increment 2) in the Hunter project area

Conclusion

We anticipate a thorough review of these comments and look forward their responses in both the forthcoming decision and in the project implementation itself.

Thank you,

A handwritten signature in blue ink that reads "Michael Krochta".

Michael Krochta

Forest Watch Coordinator, Bark