

Decision Memo

Clackamas Fires Danger Tree Abatement Roads

USDA Forest Service
Mt. Hood National Forest
Clackamas River Ranger District
Clackamas, Marion, and Jefferson Counties, Oregon

Introduction

The Clackamas River Ranger District is proposing to remove damaged trees along roads that were affected by the Riverside and Lionshead Fires that burned in September 2020. The portions of the District affected by the fires are currently closed to public access due to the dangerous conditions and the abundance of burned trees that are falling and likely to continue to fall from decay and storm events. In order to open National Forest System roads that are currently closed, the District needs to mitigate the safety concerns associated with the fire-damaged trees. If safe access on roads is not addressed in a timely manner, then portions of the District are likely to remain closed for the long term. During scoping, we had anticipated issuing one decision for roadside danger trees as well as for developed recreation areas and administrative sites, however, developed recreation areas and administrative sites have been split out and will be addressed in a separate decision document. Where roads are part of developed recreation sites or administrative sites including their associated parking areas, they are covered with that separate decision.

Purpose and Need for Action

The purpose of this project is to remedy safety issues associated with fire-damaged trees so that roads can be opened to the public and for administrative access.

This proposal is rooted in our agency's core value of safety, which has been codified in our policy direction for ensuring danger are mitigated along open roads. For example, our policy for roadside danger tree management indicates that danger trees will be managed for safe use of the transportation system by all users and that safety is the predominant consideration in road operation and maintenance, taking priority over biological or other considerations (R6 Supplement FSM-7730-2007-2, 7733.03). This policy, which is integral to the operation and maintenance of our transportation system, presents land managers with a set of binary options: where roadside dangers exist, they must be eliminated, or the road needs to be closed. The Riverside and Lionshead Fires affected approximately 219 miles of roads that had been considered "open" prior to the fires¹. Most of the area within the fire perimeters has been closed to the public since September 2020 because of the dangers posed by fire damaged trees. Therefore, there is a critical maintenance need to reduce risks through the felling of these trees along roads.

Proposed Action

In order to meet the purpose and need, the District is proposing to cut fire-killed and fire-damaged trees that are within striking distance of roads. Because there are so many fire-damaged trees, the District will use timber sale contracts where appropriate to cut the designated trees and remove them based on the standards and guidelines outlined in the Mt. Hood Land and Resource Management Plan (Forest Plan).

¹ Road status comes from Infra Database intersected with fire perimeters.

Some trees may be cut and left on-site where down wood is needed, or to meet other management objectives described below in the Forest Plan section. Service contracts or agency staff would be used to cut danger trees where timber sale contracts are not feasible. Residual slash may be treated in some areas.

This project falls within a category of actions that are excluded from documentation in an environmental analysis or environmental impact statement. Specifically, this project is covered by a category for the repair and maintenance of roads, trails, and landline boundaries (36 CFR 220.6(d)(4)). Project design criteria are included in a document titled [Clackamas Fires Danger Tree Abatement Project Design Criteria](#).

Note that Highway 224 is not included in this project since the Oregon Department of Transportation is mitigating hazardous conditions along the highway. Similarly, danger trees adjacent to powerlines are being addressed by the appropriate power agency, such as Portland General Electric and Bonneville Power Administration. Other danger trees on non-National Forest Service lands are being handled by the Bureau of Land Management or private landowners.

Roads

Approximately 219 miles of open National Forest System roads are within the fire perimeter. However, due to the spotty nature of the fire, some road segments had very low fire intensity and may have only a few, if any, danger trees. The roads proposed for treatment are listed in an appendix to this document and are shown on maps on the [Forest's website](#).

Roads were prioritized for treatment from very high to very low. The purpose of prioritizing roads for treatment is to recognize that there are limits to our ability and our funding to accomplish all this work. Some roads are important for public use and are popularly used to access developed recreation sites or the general forest for uses such as hunting, fishing, dispersed camping, or special forest product gathering. In addition to these public uses, many roads provide important access for agency employees and our partners. These uses include access to mountain top communication towers, radio repeaters, automated weather stations, powerlines, pipelines, hydroelectric projects, administrative sites, and facilities operated by special use permits. Some roads access other ownerships. Roads are also needed by agency staff to conduct post-fire work to stabilize slopes, plant trees, and conduct storm patrols to deal with culvert blockages that threaten road integrity and water quality. Because wildfires can be anticipated in the future, some road access is important to allow timely fire-suppression response. Depending on the need and the frequency of use, roads were prioritized for treatment to provide safe access.

- Very High – Primary access routes to the Forest, including Roads 46, 57, and the roads that access burned administrative sites including Timber Lake Job Corps, and the Ripplebrook compound and residential areas.
- High – System roads that access large portions of the landscape including those that are collector or arterial roads. Also included are roads that access communication towers, powerlines, and primary trailheads.
- Moderate – Open local system roads including those that are categorized as Objective Maintenance Level 2.
- Low – System roads that are open to the public but categorized as Objective Maintenance Level 1. These roads may be closed at some point in the future if an environmental analysis with public input is completed authorizing their closure after a site-specific analysis of road needs and resource risks.
- Very Low – System roads that are physically closed and categorized as Operational Maintenance Level 1. These are not included in this analysis.

- Old decommissioned system roads and existing temporary roads are not included in this analysis.

Most of the roads from Very High to Low priority are open to the public. In some cases, they are closed by a gate to prevent public access but need to be maintained for administrative access or needed access by our cooperators such as roads to mountain top communication towers. The work includes the felling of danger trees but also the treatment of excessive debris and fuels in some areas where high numbers of danger trees occur in a very small area.

The proposed action as described during scoping included roads from Low to Very High priority.

Guidance Used

The following documents represent a compilation of the best science for post-fire danger tree infrastructure management.

- The Pacific Northwest Region has guidelines for identifying danger trees using the *Field Guide for Danger Tree Identification and Response along Forest Roads and Work Sites in Oregon and Washington* (Filip 2016). This guide sets out a step by step process for determining if a tree is a danger.
- *The Post-fire Assessment of Tree Status and Marking Guidelines for Conifers of Oregon and Washington* (Hood 2020) represents the most recent science and information directly associated with predicting post-fire tree mortality in Oregon and Washington.
- This project was designed with consideration of Forest Service guidance that includes but is not limited to *Rapid Assessment Team* recommendations (USDA 2020a); *Guidance on Danger Tree Assessments and Predicting Post-Fire Tree Mortality* (USDA 2020b); Forest Service Manual, R6 Supplement No.: 7730-2007-2, TRANSPORTATION SYSTEM, CHAPTER 30 – OPERATIONS AND MAINTENANCE, June 8, 2007; and Forest Service Handbook, FSH 7709.59 - ROAD SYSTEM OPERATIONS AND MAINTENANCE HANDBOOK, CHAPTER 40 - HIGHWAY SAFETY PROGRAM, February 2, 2009.

Danger Tree Criteria

This project includes most dead trees plus live trees that would be classified as having imminent or likely failure potential within striking distance of roads. Use of these criteria will ensure that trees would only be cut that represent a danger of causing property damage, injury, or death – and thus must be removed for road maintenance. The following describes some of the rationale for those choices.

Dead Trees

The project includes most dead trees within striking distance regardless of the time frame when they may fail. It is appropriate for efficiency to deal with all the dead trees in one operation instead of coming back multiple times to assess which trees may or may not fail in a wind event. Although it is not possible to predict when or during what wind event a tree may fail, dead trees are becoming more structurally unstable as time goes by. Delaying treatment of dead trees can lead to conditions that are unsafe for fallers. The inclusion of dead trees was further supported by the analysis that shows that snags are not in short supply in the burned landscape. Millions of large snags were created by the fires; more than enough to meet the needs of snag dependent species. Felling the dead trees along roads would not measurably impact dependent species.

Trees with Green

The project includes all danger trees classified as having imminent and likely failure potential, even some that have some green leaves or needles. This includes live trees that have defects rendering them structurally unstable as well those that have some level of predictable delayed mortality due to the fire. Although the vast majority of the danger trees are dead, there are some trees that show some green even though they are dead or will be dead very soon. These trees may have a high probability of failure within 5 years. Even though this project will be implemented over a long time period as funding becomes available and as trees die over time, it is imperative to begin now so that roads and facilities can be reopened.

Some live fire-damaged trees are being retained in hope that they may survive in the long term, balanced with the need for operational efficiency to deal with trees likely to fail within 5 years.

For roads, it is appropriate for feasibility and efficiency to deal with these danger trees in one operation whenever possible instead of coming back each year to assess which trees have become structurally unstable and may fail in a wind event, or even in the absence of wind. The following is the rationale I used for seeking this efficiency.

- Fire-damaged trees can change very quickly from appearing be alive to being obviously dead. And similarly, dead trees can deteriorate very quickly from one that appears stable to one where tops break out in a wind event.
- Delaying treatment of dead trees can lead to dangerous conditions for fallers due to increased decay. Tops or large branches could break out and strike a faller. As trees decay it becomes increasingly difficult to fall them in the desired direction.
- The area is far too vast, and the Forest does not have sufficient trained staff to do an annual assessment of danger trees for roads and administrative sites.
- The Forest also does not have sufficient staff to annually assemble contracts for bidding or to administer those contracts.
- The process of assessing danger trees, assembling contracts, and implementing the work on a vast landscape would take more than one year, making annual repeat operations unfeasible.
- The Forest does not have sufficient funding to pay for the extra cost of multiple repeat efforts when the work could be completed with one operation.
- Annual repeat operations would require work areas to be temporarily closed each year so that the work could be safely implemented without endangering the public.
- Annual repeat operations would make decisions about the need for fuel cleanup difficult as debris would accumulate annually.
- Annual repeat operations would result in greater disturbance to wildlife.

For these reasons, it makes sense to accomplish as much of the work as possible in one operation.

In the absence of other risk factors, trees within striking distance of roads and administrative sites would be retained if the crown scorch or bark char are at or below the figures in the following table. Other risk factors would be addressed as described in the guides above which may include, but are not limited to, root rots, root damage, stem decay, or insect attack.

Table 1 General Forest Criteria (Adopted from Hood 2020)

Species	Criteria	5–11.9 inches diameter	12–20.9 inches diameter	21-35 inches diameter	>35 inches diameter
Douglas-fir	Crown Scorch	80%	80%	80%	80%
Douglas-fir	Bark Char	50% deep char	75% deep char	75% deep char	75% deep char
True fir	Crown Scorch	30%	30%	40%	40%
True fir	Bark Char	50% any char	50% any char	50% any char	50% any char
Spruce	Crown Scorch	75%	75%	75%	75%
Spruce	Bark Char	75% any char	75% any char	75% any char	75% any char
Cedar	Crown Scorch	30%	55%	75%	85%
Cedar	Bark Char	50% any char	50% any char	50% any char	50% any char
White Pine	Crown Scorch	55%	55%	55%	55%
White Pine	Bark Char	75% any char	75% any char	75% any char	75% any char
Lodgepole pine	Crown Scorch	40%	40%	40%	40%
Lodgepole pine	Bark Char	75% any char	75% any char	75% any char	75% any char
Hemlock	Crown Scorch	20%	20%	20%	20%
Hemlock	Bark Char	75% any char	75% any char	75% any char	75% any char

Striking Distance

The concept of striking distance involves consideration of tree height, tree lean, and ground slope as well as whether the tree is uphill or downhill from the infrastructure. Studies, including the *Field Guide for Danger Tree Identification and Response along Forest Roads and Work Sites in Oregon and Washington* (Filip 2016) indicate that in most areas, trees would be considered within striking distance if they are within 1.5 times the total tree height of the infrastructure. This may seem counter intuitive, but experience has shown that when trees fail, they can come down with substantial force and when tops break out, they often slide or roll a considerable distance. When large trees fall, they can also knock down other trees in their path or cause boulders to roll. In some cases, where trees are uphill from a road on steep slopes (greater than 30%) where rolling and sliding risks are greater, the distance may be expanded to 2 times the total tree height depending on site-specific circumstances.

Decision

Striking Distance

I have decided to only remove danger trees if they are within one tree-height of included roads.

Roads Included

In terms of roads, I have decided to defer the implementation of danger tree removal along roads in the Low and Moderate priority categories as listed in the appendix.

Exceptions to this deferral would be for roads that are currently part of ongoing timber sale or stewardship contracts. Ongoing discussions with purchasers of those contracts make it impossible at this time to know if certain roads would be needed or not to complete the contracts. If the roads are needed, the danger trees would be dealt with according to the project design criteria and the provisions of the existing contracts. Similarly, roads that are accessed by currently authorized special use permits or other valid use agreements within the burned area would have danger trees dealt with as needed according to their use agreements.

In terms of roads, this decision would result in removing danger trees along approximately 152 miles of High and Very High priority system roads. It would defer treatment on 100 individual roads for a total of

approximately 67 miles until a future analysis can be completed. I would like to emphasize that the fires burned in a typical mosaic pattern with some areas burned very hot with 100% tree mortality while other areas were skipped or had a low-intensity underburn with 0% mortality. Roads therefore cross in and out of these areas of variable-burn intensity and have varying numbers of danger trees per mile. Of the 152 miles of roads I am approving here, approximately 35% of the mileage has no danger trees.

Rationale

Striking Distance

As described above, I have decided to only remove danger trees if they are within one tree-height of included roads. This is consistent with Filip (2016), which allows for felling danger trees up to 1.5 times the total tree height depending on local conditions. By limiting this decision to one tree-height, the project will focus on the zone where it is most likely that falling trees would hit the road and therefore removing the danger trees in this area is the most urgent.

In some cases, it may be desirable or necessary to fall danger trees more than one tree-height from roads. Accordingly, I have also decided to begin an analysis for Access and Travel Management to evaluate the removal of danger trees farther than one tree-height from roads through a separate decision. Although it is important to get started on this work soon for the areas within one tree-height, most of the roads may remain closed until separate decisions authorize the rest of this important work.

Roads Included

I recognize that there will not likely be sufficient funding or capacity to complete all the danger tree work identified herein on all roads that had been open prior to these fires. In addition, based on comments received during scoping, I am interested in being responsive to requests made to consider deferring treatment along roads that were categorized as having an Objective Maintenance Level of 1. These routes are ones that we were considering putting into a closure status at some point in the future. I cannot use this categorical exclusion, or any other, to close roads. I have therefore decided to begin an analysis for Access and Travel Management to evaluate the need for the low and moderate priority roads within the fire perimeters that are deferred from this decision. At this time, the database we use to describe our transportation system and long-term access needs is out-of-date due to the changes caused by the fires. This coming planning process will include public involvement and a project-level look at the need for the shorter local roads within the fire perimeter. If I decide in this future planning effort to keep open certain roads that I am deferring now, then that future decision would assess and approve the disposition of danger trees along those roads. Until such a future decision is made, the deferred roads would have to remain closed due to the dangers present.

I have decided that the 152 miles of roads that are part of this decision are critical to the functioning of the Forest and their status would not likely be changed in a future analysis. The following statements provide some of the rationale for the remaining project-specific elements and demonstrate the urgency of this work.

- This work is critical to reopening a large portion of the Forest to public and administrative access. At this time, approximately 103,000 acres of the west side of the Forest are closed to use due to this danger. This prevents access to most developed recreation sites on the Clackamas River District including the Olallie Lake Scenic Area and wilderness trailheads. The West Cascades Scenic Byway is closed. Mountain top communication facilities are inaccessible. If safe access on roads, developed recreation areas, and administrative sites is not addressed in a timely manner, then portions of the District are likely to remain closed for the long term.

- Managing danger trees is an important first step in long-term fire recovery. It allows for safe access for other recovery work including revegetation, planting, erosion control, and culvert maintenance.
- Recreation opportunities provided by the Forest are vitally important to local economies and the recreating public. Local individuals also benefit from other uses such as the gathering of firewood and other special forest products such as mushrooms. Removing danger trees along access roads is an important first step in restoring recreation and the local economies that rely on public use.
- Timber sale contracts will be used to achieve as much of this work as possible. The Forest does not have sufficient funds to accomplish this work by itself. It is estimated it could cost tens of millions of dollars to address the safety concerns associated with the danger trees alongside roads without using timber sale contracts. In many areas, the number of dead trees is so extensive that just falling them and leaving them all would result in massive linear piles of down trees and debris. That situation is unacceptable since it would create fuel hazards and would block the movement of people and animals. Timber sale contracts will only accomplish part of the work. There are areas where the danger trees are unmerchantable or where removal is infeasible, and those areas will have to be dealt with by other means. Regardless of what contract method is used, the Forest will determine which trees are to be cut.
- Using timber sale contracts requires quick action because trees killed by fire deteriorate, and for this effort to be successful, the wood must be processed as soon as possible. Similarly, for trees that must be dealt with outside of timber sale contracts, the danger faced by fallers increases dramatically as dead trees deteriorate. For these reasons, all this work is urgent.
- Some public comments have suggested that we only open key roads and close others instead of removing the danger trees. Other commenters have suggested that we open all the roads as quickly as possible. My decision will allow for the treatment of danger trees along the most important roads now and will defer some of the decisions about lesser priority roads to a future analysis. The rating criteria will be used to prioritize routes for implementation.
- Some public comments have suggested that snags and down wood are important ecosystem elements and that they should not be removed unless absolutely necessary. After the fires, snags and down logs are, and will continue to be, a phenomenally abundant element on these landscapes. With rare exceptions, it is not essential to manage the roadside areas for snags and down wood. The project involves only 5% of the burned area. This leaves a vast landscape with high levels of dead trees to provide for the species that rely on snags and down log habitat.

Extraordinary Circumstances

The mere presence of one or more of the resource conditions considered for extraordinary circumstances does not preclude use of a categorical exclusion. It is the existence of a cause-effect relationship between a proposed action and the potential effect on these resource conditions and if such a relationship exists, the degree of the potential effect of a proposed action on these resource conditions that determine whether extraordinary circumstances exist (36 CFR 220.6(b)).

The following resource conditions were considered, and the determinations were made based on a review of the proposed action, including the project design criteria.

Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species

- Fish

Threatened fish species and aquatic sensitive species occur within the project area. There is no planned in-water work for this project. Project design criteria have been developed and will be consistent with Forest Plan standards and guidelines and with the National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) biological opinion for Routine Actions and Maintenance Activities (RAMBO) signed March 26, 2018. For sensitive aquatic species, effects can be minimized by following established project design criteria. These actions would eliminate the extraordinary circumstance for aquatic sensitive species. The project may have minor effects to sensitive aquatic species that could impact individuals but would not lead toward federal listing of these species.

- Wildlife

There are known northern spotted owl activity centers and northern spotted owl critical habitat within the project area. Although the fires had a direct impact on this species and its critical habitat, the proposed actions will not exacerbate the fire caused impact. Most actions may affect but are not likely adversely affect northern spotted owls and their critical habitat because the fires burned so intensively that many stands no longer provide essential habitat elements. However, some areas that were intensively burned but are within 500 feet of viable green habitats are considered post-fire foraging habitat. Removal of the dead trees within striking distance of roads within this post-fire foraging habitat may affect and is likely to adversely affect northern spotted owls (LAA). When reviewing the impacts to owls at both the local and broader spatial contexts, this project does not rise to the level of extraordinary circumstance due to project locations and design criteria that provide the following protections for spotted owls.

- It is presumed that owls exist at 3 viable historic activity centers even though their presence has not been validated by surveys in decades. Because proposed actions have the potential to disturb owls, seasonal restrictions are in place to minimize disturbance during the nesting period.
- Treatments would be limited to only fall and leave of danger trees with imminent or likely failure risk in the remaining viable nest patches. Leaving down wood in these areas would provide some habitat for prey species.
- Treatments would be limited to only fall and leave of danger trees with imminent or likely failure risk in remaining nesting, roosting and green foraging habitat. Leaving down wood in these areas would provide some habitat for prey species.
- The primary factor that drives the LAA determination is the removal of danger trees in post-fire foraging habitat adjacent to roads. Although this habitat is now abundant, it is temporary and would eventually be lost as trees fall. Most of this habitat affected by danger tree removal is either not in owl home ranges or is in home ranges that were burned so extensively that they are no longer considered viable for owls.
- Most of the project consists of removing trees in areas that are no longer considered owl habitat.
- Due to the linear design of the project along roads, and the mosaic nature of the burn, owls would likely be able to forage and disperse across the broader burned landscape. A recent study on post-fire foraging habitat indicates that owls will venture out approximately 500 feet

into marginal habitat. It is therefore likely that owls will cross the linear treatment area along roads particularly where green habitat remains and only danger trees are felled and left on site. The linear roadside treatment which is broken up by unburned sections is typically not considered an extraordinary effect upon the species or its habitat across the broader landscape.

For these reasons, the effects to northern spotted owls were found to be minimal.

There are known sites for Regional Forester's Sensitive Wildlife Species within the project area. These effects can be minimized by following established project design criteria, avoiding, or minimizing the disturbance to these populations. These actions would eliminate the extraordinary circumstance for wildlife sensitive species. Additionally, in some cases, while the species is present in the project area, species-specific habitat is not present within the vicinity of the proposed action. Effects to these species could impact individuals but would not lead toward federal listing of these species.

- **Botany**

There are known sites for Regional Forester's Sensitive Species within the project area. Effects to these species could impact individuals but would not lead toward federal listing of these species. These effects can be mitigated by avoidance of known sites from mechanical activity. The proposed action will avoid or minimize disturbance to these populations which would eliminate the extraordinary circumstance for botanical resources. There are no Federally listed threatened or endangered species or designated critical habitat, and no species proposed for Federal listing or proposed critical habitat.

The project will not have extraordinary circumstances associated with Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species.

Floodplains, wetlands, or municipal watersheds

- ***Floodplains***

There are no jurisdictional floodplains within the roadside treatment corridors as per Executive Order 11988. Floodplains are limited and localized and would be within the Riparian Reserve network defined by the Northwest Forest Plan, and as described by the Forest Plan as Riparian Areas. Activities proposed within Riparian Reserves would be limited in extent and to the outer zone as defined by project design criteria. The proposed action would be consistent with Section 404 of the Clean Water Act.

- ***Wetlands***

Inventoried or jurisdictional wetlands have been mapped within or immediately adjacent to the roadside abatement corridors. There are no activities proposed that would jeopardize these features as per Section 404 of the Clean Water Act. No dredging or filling of these wetland features would occur as part of the proposed action. Similarly, proposed actions would not alter or threaten non-jurisdictional wetland features.

All wetland features would be considered part of the Riparian Reserve network defined by the Northwest Forest Plan, and as described by the Forest Plan as Riparian Areas. Standards and guidelines pertaining to their management would be applied as a means for their protection and

conservation. Specific best management practices and project design criteria have been developed to avoid and minimize disturbance to them from proposed activities.

- ***Municipal Watersheds***

There are several municipal watersheds in and downstream of the project area including the Breitenbush Hot Springs, Canby Utility, Clackamas River Water-Clackamas, City of Estacada, and City of Molalla. In addition, on the Clackamas River, municipal water supplies, including City of Lake Oswego, North Clackamas County Water Commission, and South Fork Water Board, have intakes downstream of the project area.

The project was designed to minimize sediment delivery and stream temperature impacts to protect water quality for municipal supply. Therefore, there would not be measurable impacts to municipal watersheds by removing danger trees from alongside roads.

The project will not have extraordinary circumstances associated with floodplains, wetlands, or municipal watersheds.

Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas

- ***Wilderness***

Several wilderness areas were burned intensively. The project includes some road segments that are near wildernesses that were designated in the Omnibus Public Land Management Act of 2009 where boundaries have not yet been finalized. These wildernesses include the Memaloose Lake, South Fork Clackamas, and Clackamas Canyon portions of the Clackamas Wilderness, and the Roaring River Wilderness. Tree abatement activities would be limited to within one tree-height of these adjacent roads and thus will be consistent with setback direction from a wilderness boundary which is necessary for maintaining human-made features, such as roads (Forest Service Handbook 1909.12, Chapter 70, Section 73). The area where danger tree abatement would occur is within the road maintenance corridor and is not expected to directly impact the wilderness area.

The Mt. Jefferson Wilderness has finalized boundaries and has danger trees within striking distance of a road - Road 4220. Danger trees along this road within the wilderness would be felled and left on-site.

Equipment may produce some minor dust or noise, which could be noticeable to wilderness users nearby. Since these potential impacts are likely to be very minor and short term, I find that this does not constitute an extraordinary circumstance.

- ***Potential Wilderness***

The 2009 Omnibus Public Land Management Act created the Roaring River Potential Wilderness Area. It is an area surrounded by the Roaring River Wilderness and it contains several miles of open roads and numerous clearcuts. It is to be managed similar to a wilderness and eventually be merged into the Roaring River Wilderness when it is determined that it is compatible with the Wilderness Act. The roads in this area have been deferred to a future analysis for potential closure or decommissioning.

- ***Special Protection Areas***

The 2009 Omnibus Public Land Management Act created Protection Areas that were burned. The project includes some road segments that are near the Cultus Creek and Upper Big Bottom

Protection Areas where boundaries have not yet been finalized. Tree abatement activities would be limited to within one tree-height of adjacent roads using the same setback direction as used for wilderness boundaries which is necessary for maintaining human-made features, such as roads.

- ***Wild and Scenic Rivers***

There are five Wild and Scenic Rivers in the vicinity of the fires.

- The Clackamas River has scenic and recreational segments and it has a completed comprehensive river management plan. Portions of the river corridor burned very intensively. The outstandingly remarkable values are Botany/Ecology, Fish, Wildlife, Recreation, and Cultural Resources. The danger trees along Highway 224 are not part of this project because they are included in an Oregon Department of Transportation operation.
- Roaring River has a wild designation except where it crosses Highway 224 where it is recreational. It has a completed comprehensive river management plan. The fire burned with relatively low intensity in the river corridor with the greatest intensity near the river's junction with the Clackamas River. The outstandingly remarkable values are Water Quality, Botany, Fisheries, Wildlife Habitat, Recreation, and Scenic Resources. The danger trees along Highway 224 are not part of this project because they are included in an Oregon Department of Transportation operation. No other roads cross into the river corridor and no additional danger trees would be removed.
- The South Fork Clackamas River has a wild designation. The entire river corridor intensively burned. The comprehensive river management plan is under development. The only road that crosses through the wild river corridor is road 45. The outstandingly remarkable values are Scenery and Historic.
- Fish Creek has a recreational designation and its comprehensive river management plan is under development. The river corridor burned very intensively. The outstandingly remarkable value is Fisheries. Road 54 parallels Fish Creek closely.
- The Collawash River comprehensive river management plan is under development. It has a recreational designation at its confluence with the Clackamas River where the Riverside Fire burned, and a scenic designation at the headwaters where the Lionshead Fire burned. The outstandingly remarkable values are Recreation, Geology, Fisheries, and Botany. Only a small area burned where roadside danger trees overlap the river corridor.

No danger trees would be felled into these waterways because these waterways are considered relatively low priority for fisheries enhancement projects at this time. If instream fisheries projects are considered in the future, a Section 7 analysis under the Wild and Scenic Rivers Act would first be completed. The outstandingly remarkable values have been assessed by the appropriate resource specialists and the impacts were found to be minimal. The project is also consistent with the existing comprehensive river management plans, as well as the plans that are currently under development.

There are no wilderness study areas or national recreation areas affected by the project. The project will not have extraordinary circumstances associated with congressionally designated areas.

Inventoried roadless areas or potential wilderness areas

- ***Inventoried roadless areas***

There is an inventoried roadless area in the Olallie Lake Scenic Area and within the Lionshead Fire perimeter. However, the boundaries of this area are outside the roadside danger tree zone. Therefore, the project would not reduce the size of the roadless area or affect roadless values.

- ***Potential Wilderness Areas***

There are no areas affected by the fires that qualify as Forest Service potential wilderness areas according to Forest Service Handbook 1909.12_70. A congressionally designated Potential Wilderness Area (discussed above) was found to not meet Forest Service standards because it contains several miles of roads and numerous clearcuts.

The project will not have extraordinary circumstances associated with inventoried roadless areas or Forest Service potential wilderness areas.

Research natural areas

There are no Research Natural Areas within the fire perimeters.

American Indians and Alaska Native religious or cultural sites/Archaeological sites, or historic properties or areas

The project will follow the phased approach to comply with Section 106 of the National Historic Preservation Act detailed in the 2021 Programmatic Agreement between United States Department of Agriculture, Forest Service, Fremont-Winema, Mt. Hood, Rouge River-Siskiyou, Umpqua, and Willamette National Forests, the Oregon State Historic Preservation Office, and the Advisory Council on Historic Preservation regarding Fire Salvage, Recovery and Restoration in Oregon. In this phased approach, a final NEPA decision on undertakings may be approved prior to completion of the identification and evaluation of properties in the entire area of potential effects provided that all stipulations within the programmatic agreement are followed.

The Forest Service acknowledges its continued responsibility to engage in meaningful consultation with Federally recognized Tribes with interest in these lands. The Confederated Tribes of Grand Ronde, Confederated Tribes of Siletz Indians of Oregon, and the Confederated Tribes of the Warm Springs Reservation of Oregon have all been provided the opportunity to participate in the development of the programmatic agreement and the protection measures it outlines for historic properties. Consultation will continue with each Tribe throughout the lifetime of this project.

The project area contains 57 previously documented historic properties. Effects to these and undiscovered sites can be mitigated by avoidance of known sites from mechanical activity. Where avoidance is not possible, other design criteria were developed to protect these resources. Avoiding or minimizing the disturbance to historic properties eliminates the extraordinary circumstance for heritage resources.

Consistency with Relevant Laws, Regulations, and Policy

Land and Resource Management Plan

The Mt. Hood National Forest Land and Resource Management Plan (the Forest Plan), as amended, provides standards and guidelines.

The Forest Plan, as amended, includes the following goals (Page Four-3):

- Manage Forest recreational access to protect natural resources, provide for public safety, and minimize conflicts among various users of the Forest. Goal #16.
- Provide safe efficient access for movement of people and materials involved in the use and management of the Forest. Provide for construction and maintenance of roads at a level that will minimize environmental damage. Goal #17.
- Produce wood fiber at sustainable levels consistent with other resource values and economic efficiency. Goal #19.

In the introductory section of the Forest Management Goals on page Four–2 of the Forest Plan, the following guidance is found: “Forestwide Standards and Guidelines describe in a measurable fashion the bounds and or constraints within which all activities necessary to accomplish Forest management objectives must operate. All resource program and project implementation activities necessary to move the Forest character toward (and to) the desired future condition must adhere to these Standards and Guidelines.” Due to the fires, the existing condition is not in alignment with the desired conditions expressed by many Forest Plan standards and guidelines. However, the project has been carefully designed and would not measurably further degrade resource conditions. A Forest Plan consistency checklist is located in the analysis file, and discussions of specific standards and guidelines are addressed in each specialist report where needed for additional clarity. These analyses found that the project is consistent with Forest Plan Goals and with applicable standards and guidelines.

Other Relevant Law, Regulation, or Policy

- *Clean Air Act*: My decision is consistent with the Clean Air Act. Burning would be scheduled in conjunction with the State of Oregon to comply with the Oregon Smoke Implementation Plan to minimize the adverse effects on air quality.
- *National Forest Management Act*: The proposed actions were developed to be in full compliance with NFMA via compliance with the Forest Plan, as amended.
- The project complies with Executive Order 12898 regarding environmental justice. No disproportionately high adverse human or environmental effects on minorities and/or low-income populations were identified during the analysis or public involvement process.

PUBLIC INVOLVEMENT

These categories of actions do not require a formal public comment period. However, a 15-day scoping period began on February 26, 2021. The project was posted on the Forest’s website and a notice was sent to a local mailing list and to interested individuals via GovDelivery (an electronic messaging program). Notices were sent to Tribal contacts. A presentation was made to the Clackamas Stewardship Partners; a local collaborative group. Comments received are in the administrative record as well as a document summarizing them and how the agency considered them.

This project is not subject to predecisional administrative review pursuant to 36 CFR 218, Subpart B, also called the “objection process.” The full text of the rule can be found at [USDA website²](#).

Activities included in this decision may begin immediately. For additional information, please contact James Roden at james.roden@usda.gov or 541-604-1230.

Jackie Groce
District Ranger
Clackamas River Ranger District

References

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Hood, S.M., Ragenovich, I. and Schaupp, B. 2020. Post-fire Assessment of Tree Status and Marking Guidelines for Conifers in Oregon and Washington. USDA Forest Service, Pacific Northwest Region. R6-FHP-RO-2020-02. 59p. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd814664.pdf

USDA Forest Service 2020a. USFS Pacific Northwest Region. Riverside and White River Fires Rapid Assessment Team Report Mt. Hood National Forest - Clackamas River and Barlow Ranger Districts. October 29-30, 2020. (Unpublished).

USDA Forest Service 2020b. USFS Pacific Northwest Region. Guidance on Danger Tree Assessments and Predicting Post-Fire Tree Mortality. (Unpublished).

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² https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5442116.pdf

Road List Appendix

The following roads add up to approximately 219 miles. In some instances, only a small section of a longer road was impacted by the fires. However, this decision only includes the Very High and High priority roads which add up to approximately 152 miles.

Table 2

Road Number	Length Affected	Priority	Rationale
4600000	6.9	Very High	Accesses vast landscape, Many Rec Sites, POD
4600025	0.2	Very High	Admin site, Timber Lake Job Corps
4600027	0.3	Very High	Admin site, Timber Lake Job Corps
4600028	0.2	Very High	Admin site, Timber Lake Job Corps, sewerline/waterline under road
4600029	0.3	Very High	Admin site infrastructure
4600030	0.8	Very High	Admin site, Timber Lake Job Corps, sewerline/waterline under road
4600032	0.2	Very High	Admin site, Timber Lake Job Corps, sewerline/waterline under road
4600210	0.9	Very High	Admin site, Timber Lake Job Corps
4600240	0.2	Very High	Admin site, Ripplebrook Guard Station
4631000	0.8	Very High	Admin site, Ripplebrook housing, heliport
4631014	0.4	Very High	Admin site, water tank, Ripplebrook
4631015	0.2	Very High	Admin site, water tank, Ripplebrook
4631120	0.3	Very High	Admin site, Ripplebrook road to heliport, sewerline/waterline under road
4631130	0.3	Very High	Admin site, Ripplebrook housing
4631131	0.1	Very High	Admin site, Ripplebrook housing
4631140	0.7	Very High	Admin site, to heliport, water tank
5700000	3.2	Very High	Accesses vast landscape, Many Rec Sites, POD
4220000	5.6	High	Access to Olallie Rec Sites, POD
4220000	6.8	High	Access to PCT, wilderness, POD
4220019	0.4	High	Access to/under BPA powerline
4220160	0.2	High	Rec Site, Lower Lake CG
4220170	0.1	High	Rec Site, Olallie Lodge
4220173	0.1	High	Rec Site, Olallie Guard Station
4220175	0.1	High	Rec Site, Camp 10 CG
4220180	0.9	High	Rec Site, Peninsula CG
4220190	0.1	High	Rec Site, Horseshoe Lake CG
4220210	0.2	High	Rec Site, Breitenbush PCT trail head
4500000	22.6	High	Accesses vast landscape, Com sites, trail heads, POD on west side
4500220	0.7	High	Seed Orchard, gated
4500240	1.0	High	Seed Orchard, gated
4500270	2.0	High	Wanderer's peak RAWS site, gated
4500340	1.1	High	Com Tower, C800
4500350	0.7	High	Com Tower, C800
4510000	0.4	High	Access to BLM, Goat Mt. Com site, different section of road is Moderate
4510021	1.0	High	Goat Mt. Com site
4520000	0.7	High	Access to Goat Mt. Com site
4530000	0.6	High	Collector, accesses BLM, POD
4540000	7.6	High	Collector, accesses BLM, wilderness trail head, POD
4545000	4.7	High	Collector, accesses BLM, POD
4550000	6.4	High	Collector, access broad landscape
4600011	0.1	High	Admin site, Lazy Bend, gated
4600076	5.8	High	BPA Powerline access
4600130	.02	High	Rec Site, Lazy Bend CG
4600140	0.3	High	Rec Site, Carter Bridge CG
4600145	0.1	High	Rec Site, Carter Bridge river access
4600150	0.3	High	Rec Site, Lockaby CG
4600160	0.3	High	Rec Site, Armstrong CG
4600180	0.1	High	Rec Site, Roaring River CG
4600190	0.3	High	Rec Site, Sunstrip CG
4600200	0.7	High	3 Lynx site
4600200	2.1	High	PGE pipeline road
4600220	0.2	High	Administrative, Timber Lake site
4600250	0.4	High	Rec Site, Ripplebrook CG
4600260	0.4	High	Rec Site, Rainbow CG
4600270	0.3	High	Rec Site, Riverside CG

Road Number	Length Affected	Priority	Rationale
4600380	1.3	High	Accesses Red Lake trail head
4610000	3.1	High	Access to Ladee Flat Rec Site, POD
4611000	1.7	High	Access to wilderness
4620000	0.6	High	Access to Indian Henry CG
4620000	10.9	High	Access to broad landscape, POD, access to Fish Cr. Mt. Trail
4620119	0.2	High	Rec Site, Indian Henry CG
4620120	0.5	High	Rec Site, Indian Henry CG
4620121	0.1	High	Access to trail head across from Indian Henry CG
4620122	0.2	High	Rec Site, Indian Henry CG
4620123	0.3	High	Rec Site, Indian Henry CG
4630000	3.9	High	Accesses broad landscape, PGE, wilderness
4630012	0.5	High	PGE, Frog Lake
4630027	0.1	High	PGE access, Frog Lake
4631000	1.3	High	Admin access, PGE, Lake Harriet
4631011	0.1	High	Admin access, Bunkhouse
4635000	3.5	High	Accesses broad landscape, wilderness trail heads (first section High, rest Low)
4671000	2.5	High	Accesses broad landscape, mostly not burned
4672000	0.4	High	Accesses broad landscape, mostly not burned
4691000	0.8	High	Access to BPA powerline
5400000	1.8	High	Accesses broad landscape, Com site
5400100	0.4	High	Rec Site, Fish Creek CG
5400125	0.1	High	Rec Site, Boat Launch, trail head
5410000	9.6	High	Accesses a broad landscape, Access to Whalehead com site
5411000	6.2	High	Access to Whalehead com site
5411000	0.3	High	Whalehead com site, gated
5411210	0.3	High	Whalehead com site, gated
5412000	1.7	High	Access broad unburned landscape
5710000	2.0	High	Accesses broad unburned landscape, access to Com Site C800
6350000	3.9	High	Accesses broad landscape, mostly not burned, POD
6355000	0.8	High	Accesses broad landscape, mostly not burned
6355150	0.3	High	Access to Round Lake and broad landscape
6370220	0.9	High	Access to Round Lake and broad landscape
4500210	1.9	Moderate	
4510000	2.5	Moderate	Road split, Different section of this road is High Priority
4510130	2.4	Moderate	
4510150	1.3	Moderate	
4510160	0.5	Moderate	
4540014	0.1	Moderate	
4540140	0.8	Moderate	
4620180	0.6	Moderate	
4620200	0.5	Moderate	
4621000	2.2	Moderate	
4622000	3.1	Moderate	
4630160	0.6	Moderate	
4640000	1.8	Moderate	
4645000	0.8	Moderate	
4671220	1.2	Moderate	
5411155	0.3	Moderate	
5411180	1.7	Moderate	
6350320	1.2	Moderate	
4220021	0.4	Low	
4220022	0.6	Low	
4500130	0.6	Low	
4500240	1.0	Low	
4500242	0.2	Low	Road split, Closed at MP 0.2
4500245	0.9	Low	
4500246	0.5	Low	
4510028	0.1	Low	
4540012	0.5	Low	
4540015	0.1	Low	
4540017	0.2	Low	
4540022	0.2	Low	

Road Number	Length Affected	Priority	Rationale
4540120	0.2	Low	
4540135	0.1	Low	
4540150	1.4	Low	
4540160	0.4	Low	
4540170	1.9	Low	
4540180	0.5	Low	
4540190	0.5	Low	
4540200	0.3	Low	
4545011	0.1	Low	
4545120	1.1	Low	
4545130	1.0	Low	
4550014	0.3	Low	
4550016	0.1	Low	
4550122	0.2	Low	
4550125	0.2	Low	
4600021	0.5	Low	
4600023	0.1	Low	
4610113	2.0	Low	
4620017	0.2	Low	
4620130	0.1	Low	
4620190	1.3	Low	
4620195	0.2	Low	
4620220	0.8	Low	
4621022	0.7	Low	
4621150	1.4	Low	
4621160	0.4	Low	
4621162	0.3	Low	
4621180	0.7	Low	
4621200	0.8	Low	
4621220	0.4	Low	
4622000	0.3	Low	
4622013	0.4	Low	
4622014	0.1	Low	
4631012	0.1	Low	
4631014	0.5	Low	Road split, Low past mp. 0.47
4635000	0.5	Low	
4635020	0.5	Low	
4635126	0.8	Low	
4635130	0.5	Low	
4635135	0.1	Low	
4635146	0.3	Low	
4635157	1.2	Low	
4690016	0.1	Low	
5400018	0.4	Low	
5410012	0.6	Low	
5410013	0.4	Low	
5410019	0.4	Low	
5410120	3.1	Low	
5410134	0.8	Low	
5410136	0.4	Low	
5411013	0.5	Low	
5411015	0.4	Low	
5411017	0.3	Low	
5411018	0.2	Low	
5411120	0.6	Low	
5411130	0.1	Low	
5411140	0.2	Low	
5411150	0.7	Low	
5411160	1.5	Low	
5411200	0.7	Low	
5412120	0.9	Low	
5700019	0.1	Low	

Road Number	Length Affected	Priority	Rationale
5700110	0.1	Low	
5700120	0.1	Low	
5700130	0.2	Low	
5700140	0.5	Low	
5700150	0.4	Low	
5710013	0.2	Low	
5710014	0.1	Low	
6350291	0.5	Low	

POD = Potential Operational Delineation, (Fire control lines)

PGE = Portland General Electric

BLM = Bureau of Land Management

MP = Mile Post

CG = Campground

C800 = Clackamas County funded communication towers