

December 14th, 2020



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Kameron Sam, District Ranger
Barlow Ranger District
780 NE Court St.
Dufur, OR 97021

RE: White River Fire Roadside Tree Abatement Project

Dear Kameron,

As you are aware, 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 31,000 supporters¹ who use the public land forests surrounding Mt. Hood, including the areas within the White River project area, for a wide range of uses including, but not limited to: hiking, nature study, non-timber forest product collection, spiritual renewal, and recreation. We submit these comments on behalf of our supporters. We request that you actively engage with the substance of these comments and use the information herein to create a better project for the Barlow Ranger District.

TRAVEL ANALYSIS REPORT

Given that the FS is considering steps to reopen and maintain a number of miles of roads within the White River Fire perimeter, and given the large geographic scale of this project, the agency should consider its Travel Analysis Report (TAR)

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.

for the Barlow District and identify the Minimum Road System (MRS).² The roads identified for tree abatement activities should reflect this MRS – meaning roads that are not part of this MRS should ideally not receive treatment other than closure.

In 2015, the FS released its TAR, a synthesis of past analyses and recommendations for project-level decisions regarding changes in road maintenance levels. Included in this report was a [list of roads “not likely needed”, with the objective maintenance level being “D-decommission”](#).

To identify the minimum road system, the FS must consider whether each road segment the agency decides to maintain on the system is needed to meet certain factors outlined in the agency’s own regulation.³ Here, the FS should consider whether each segment of the road system within the project area is needed to:

- Meet resource and other management objectives adopted in the relevant land and resource management plan;
- Meet applicable statutory and regulatory requirements;
- Reflect long-term funding expectations; and
- Ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

In assessing specific road segments, the FS should also consider the risks and benefits of each road as analyzed in the TAR, and whether the proposed road management measures are consistent with the recommendations from the travel analysis report. **To the extent that the final decision in this project differs from what is recommended in the travel analysis report, the FS must explain that inconsistency.**

GENERAL RECOMMENDATIONS

- Focus hazard tree removal on imminent hazard trees located within 150 feet of high use areas, such as developed sites, parking lots, and paved roads. Use hazard trees for restoration of streams and placement in nearby stands that lack large wood.

² 36 C.F.R. § 212.5(b)(1) (“For each national forest . . . the responsible official must identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.”).

³ 36 C.F.R. § 212.5(b)(1). *See also* Attachment A (“analyze the proposed action and alternatives in terms of whether, per 36 CFR 212.5(b)(1), the resulting [road] system is needed”); (“The resulting decision [in a site-specific project] identifies the [minimum road system] and unneeded roads for each subwatershed or larger scale”).

- Avoid cutting live, green trees, since all surviving trees are helping to rebuild the below-ground ecosystem and serve a valuable role as legacy structure and a recruitment pool for future large trees and snags. All trees presumed to be dying should be treated as live until they are dead, because we do not want to lose the ecological benefits of those trees that may unexpectedly survive.
- Roads which are currently closed should not be considered for treatment.
- In the final decision for this project, include roads which are to be treated. Identify the number of continuous or discontinuous acres treated, and miles of road maintained.
- If trees are felled within 70 feet of streams, springs, or seeps, leave the trees on the ground and fell them away from and parallel to the stream protection buffers.
- Keep ground-based equipment on the existing road prism.
- Use residual trees or slash deemed safe to leave on site (i.e. not burned) to block and cover any unauthorized OHV trails created by users in the area.
- In the final decision for this project, address consultation and seasonal restrictions (i.e. northern spotted owl).
- If any trees are cut in Late Successional Reserves are to be sold commercially, an analysis on impacts to dead wood is required by the Northwest Forest Plan.

We anticipate a thorough review of these comments and look forward to the necessary changes made to both the forthcoming decision and the project itself.

Thank you,



Michael Krochta
Forest Watch Coordinator, Bark