

(Your letter ID is **65780-6319-10**)

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

Phil Monsanto, District Ranger
Clackamas River Ranger District
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

RE: Stone Creek Vegetation Management Project

Dear Phil,

As you are aware, Bark's mission is to transform the lands now known as 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. Bark has over 31,000 supporters¹ who use and depend on the forests surrounding Mt. Hood, including the areas within the Stone Creek 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.

TRIBAL INCLUSION

The Stone Creek project area is located within the ancestral homelands and ceded territories of The Confederated Tribes of Warm Springs. Though it is not our place to speak on behalf of Warm Springs members and their government, we encourage and support meaningful collaboration between the Tribe and the

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.

federal government that holds these lands in trust. Bark believes that incorporating Tribal perspectives and values into all aspects of project design and implementation will lead to better outcomes for the land and its people.

COLLABORATION

Bark wants to recognize and thank the IDT for introducing this project to Clackamas Stewardship Partners and for planning/hosting a field tour of the project area in September 2024. There has been a lot of turnover on the district since 2020 and the field tour offered an excellent opportunity to meet the staff on the IDT and to begin longer conversations about proposed actions. The staff present were attentive, responsive, and genuine. These kinds of meaningful interactions help to increase transparency and build trust between the public and Forest Service. Though interacting in this way takes additional time and effort, Bark believes that continuing meaningful collaboration will lead to better project design for Stone Creek and future projects on the district. Thank you.

WETLANDS

There are many wetlands and meadows within the project boundary that exist in varying conditions. Many appear altered and degraded because of timber harvest, road building, and fire suppression.

Bark is disappointed that no analysis of potential wetland/meadow restoration has been included in the scoping letter. We believe that restoring degraded wetlands would meet the purpose and need of this project and add to the overall structural and species diversity in the area. Additionally, during conversations with district staff and representatives with the Confederated Tribes of Warm Springs, Bark learned that there could be an opportunity for a co-stewardship project related to wetland/meadow restoration in the Timothy Lake area. We encourage you to pursue this opportunity, whether that be as part of this project or a project in the future.

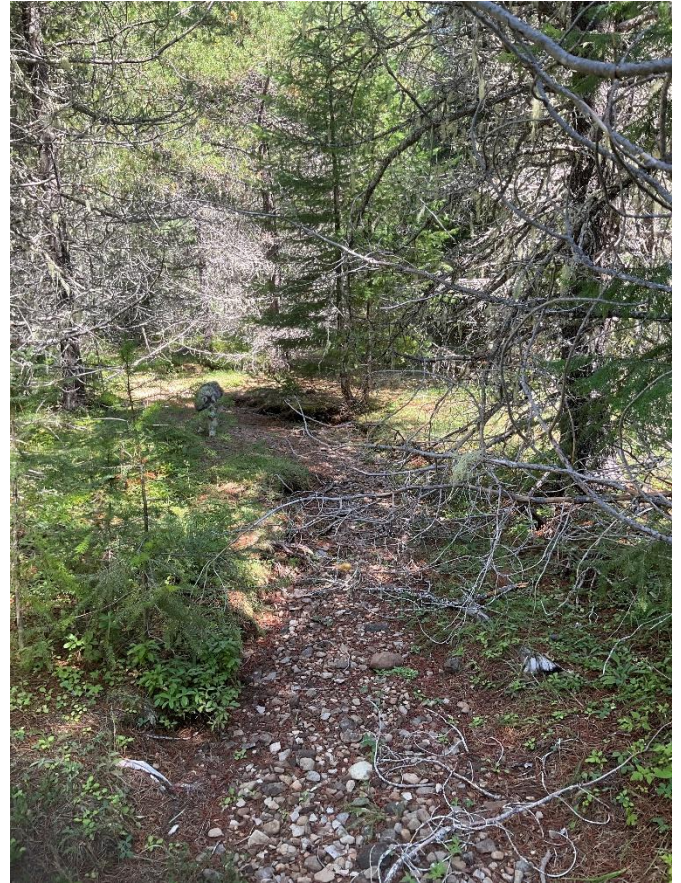
Unit 1349

There is a mapped wetland/meadow area along the eastern boundary of unit 1349 (45.0774, -121.79788). During surveys, Bark found that this wetland may extend beyond the mapped boundary and into part of unit 1349. Though much of the wetland was dry when we were there in late August 2024, the presence of wetland indicator species points to this area being seasonally flooded/saturated.



Near eastern boundary of unit 1349. Photo shows regenerating trees and wetland indicator species in understory

Additionally, there is an unmapped creek-like feature (seen below) where water runs seasonally, another indicator that there are seasonally saturated soils within or near the unit (45.074817, -121.797672).



During your analysis, please groundtruth and verify the extent of this wetland/meadow to ensure that heavy machinery associated with treatment in unit 1349 do not disturb this sensitive area.

DISPERSED CAMPING

As you are aware, the Timothy Lake area is an extremely popular destination for camping and recreation. As established campgrounds around the lake fill to capacity, forest visitors look elsewhere to set up camp, and the many dispersed camping spots scattered throughout the project area are popular locations. Many (if not most) of these dispersed campsites need remediation and rehabilitation. During visits to the area in summer 2024, Bark staff and volunteers observed many dispersed sites (especially along FS road 5740) containing trash and

biological waste. In addition, some sites allow for inappropriate access by vehicles into the surrounding forest or riparian areas.

The most egregious example is a large and popular dispersed site located where road 5740 crosses Stone Creek (45.0893, -121.80368). At this site, vehicles can drive off road in a large area as well as into and across the adjacent creek. Just across 5740 to the east is another dispersed site which allows vehicles to drive off road, leading to riparian habitat degradation and soil compaction exposing the roots of trees.

This issue, and I believe the site mentioned above specifically, was brought up and discussed during the September 2024 field tour. Everyone on the tour agreed that the state of dispersed campsites in the area is a major issue that needs to be addressed. So, it is disappointing that none of the proposed actions in the scoping letter mention dispersed camp site restoration work.

Bark believes that addressing problematic dispersed camp sites would meet the purpose and need of this project, part of which is to improve forest health. Though we don't yet have specific locations where work is needed (other than the sites mentioned above) Bark would like to work with the FS to identify and prioritize site locations in need of restoration as part of this or future projects.

FIRE

Bark appreciates your recognition of the important role fire plays in shaping these forest ecosystems, and recognizing the harm caused by a strict suppression policy. The Agency needs to shift its perspective and management of wildfire, and we hope that some of the proposed actions stated in the scoping letter will move things in a positive direction.

Bark is a strong advocate for using fire as a management tool and we appreciate the IDT for including broadcast burning as a proposed action in the Stone Creek project. Broadcast burning will be a critical tool needed to meet the purpose and need of improving forest health, restoring structural diversity, reducing stand density, and reducing hazardous fuels accumulation. We encourage you to use fire as much as possible as part of this project.

COMMERCIAL THINNING

In commercial thinning units, please incorporate PDCs that protect and retain any biological legacies (large trees, snags, downed logs, etc.) that might remain in historic clearcuts and shelterwoods. Retaining these legacies will be critical to achieving the stated desired future condition "...of healthy mid-seral stands with increased growth, structural diversity, retained or increased species diversity..."

Sanitation Treatment Units 1365 & 2000

It is clear that many of the "off-site" lodgepole in the overstory are suffering from insects and disease, and we understand the desire to improve stand conditions by taking action. We also understand that removing these lodgepole through commercial means may help make the project (or at least this portion of it) financially viable. However, we question whether the proposed action will actually benefit the stand in the long term.

During the field tour in September 2024, the understory in these units looked to be healthy and diverse with species appropriate for the zone/area. During the field tour, it was acknowledged that a commercial harvest and underburn would have an impact the understory. While forest management actions are always about balancing the trade-offs of impacts and benefits, Bark is unconvinced at this time that commercial removal of overstory lodgepole will be a net benefit.

During your analysis, please revisit similar treatments on the district (Hunter EA, Lemiti Butte) to learn any insights on the effectiveness of the proposed treatment. Would removal of the overstory damage the understory, increase vulnerability to frost, and keep the unit stuck in the same cycle? Would doing nothing, or just underburning, allow the understory to regenerate into a more desirable and diverse stand? Bark believes that answering these questions during analysis will improve the efficacy of this project.

TEMPORARY ROADS

Though often needed for project implementation, temporary roads have long been controversial with Bark and our supporters. Improper construction and use of temporary roads can cause soil compaction, erosion, and facilitate the spread of invasive and noxious weeds. And without careful and proper obliteration, Bark questions how temporary these roads and their impacts actually are.

Bark appreciates and supports using existing temp road alignments as much as practical during implementation. There are already many existing alignments in the project area built during past harvests, and most we found still have

compacted soils lacking regenerating vegetation. Reuse of these alignments followed by appropriate obliteration could improve the condition of these areas following implementation. However, in flat areas and places popular for public visitation (like the project area), temporary roads can be accessed for unauthorized motor vehicle use. We ask that PDCs attempt to prevent this both during and after implementation by placing berms, boulders, logs, etc. wherever temp roads meet open system roads.

Additionally, **Bark requests that you include a map of potential temporary road alignments as part of your analysis and documentation.** This has become standard practice on the East Zone (see attached “Gibson – Temporary Roads” pdf) and we would appreciate including it as part of this and future projects for the purpose of transparency.

ROADSIDE FUELS TREATMENTS

Bark is generally supportive of roadside fuels treatments that retain large diameter trees, especially treatments that can facilitate the use of fire as a management tool. However, we do have some concerns.

Many of the roadside treatments will take place in late seral stands and could include the use of masticators and other heavy machinery. Will masticators be allowed to operate up to 150ft from the road edge in late seral stands? These machines are large, heavy, and lack precision. They could compact soils, damage root systems, and cause inadvertent damage to large trees. In our opinion, using masticators should be avoided when implementing fuels treatments in old stands. We encourage the FS to use hand crews to conduct fuels treatments in old stands.

ROAD CLOSURES AND DECOMMISSIONING

Bark appreciates and fully supports proposed actions to reduce road density in the project area. While decommissioning is preferred, we understand that it can be extremely costly. Road closure and storm proofing are positive steps in the right direction.

One note: **How will you prevent vehicle access to these roads once they are closed?**

ADDITIONAL INFORMATION AND SPECIFIC UNIT COMMENTS:

There is an old wooden foot bridge spanning Rock Springs creek at 45.055094, -121.816578. This bridge is likely associated with a previous harvest and connects two old non-system roads. **Bark requests this bridge be removed as part of the project.**



Old wooden foot bridge in disrepair

CONCLUSION

Bark has provided several suggestions for improving the Stone Creek Vegetation Management project. We appreciate you reading Bark's comments and finding ways to incorporate the above suggestions. If there is anything in this document that you have questions about or would like to discuss, please reach me at jordan@bark-out.org. We look forward to more open dialogue about this project.

Thank you,

A handwritten signature in black ink, appearing to read 'Jordan Latter', with a long horizontal flourish extending to the right.

Jordan Latter
Forest Watch Coordinator, Bark