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Jennifer Watts, District Ranger
Clackamas River Ranger District
Mt. Hood National Forest
ATTN: Clackamas Fires Danger Tree Assessment
16400 Champion Way
Sandy, OR 97055-7248
971-280-3520

Re: Clackamas Fires Roadside Danger Tree Assessment

Dear Ranger Watts,

Thank you for the opportunity to submit scoping comments for the Clackamas Fires Roadside Danger Tree Assessment. We acknowledge that recent wildfires have caused considerable challenges for the Mt. Hood National Forest and its management of the public lands and waters it stewards for all Americans. At the same time, we are concerned that post-fire management actions sometimes extend the negative impacts of these wildfires on local communities and public land users, and we encourage the Forest Service to fully consider these impacts when developing projects and prioritizing implementation.

About American Whitewater

American Whitewater is a national river conservation non-profit founded in 1954. With approximately 50,000 supporters, over 6,900 dues-paying members, and 100 locally based affiliate clubs, we represent whitewater enthusiasts across the nation. Our mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. We are the nation's primary advocate for the preservation and protection of whitewater rivers, and we connect the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within our mission. Core to our work is the belief that the public should have access to their rivers for recreation and other uses.

A significant percentage of our members live in or visit the Pacific Northwest and many of these members use the Clackamas River and its tributaries for boating, fishing, and hiking as well as for education, interpretation, inspiration, and for physical and mental health. For our members living in Multnomah and Clackamas counties, the Clackamas River is enjoyed as the most consistent and dependable close-to-home whitewater that flows year-round. Many of our members also work in the local outfitting industry and provide experiences for the general

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public to enjoy this place. While the forest has been significantly impacted by the fire, the river itself remains a spectacular section of whitewater that our members and the public seek to enjoy.

Comments

[Access to Fish Creek should be provided even if Road 5400000 is closed.](#)

Road 5400000 provides vehicle access to the lower reaches of Fish Creek, a designated Wild and Scenic River that is paddled by whitewater boaters.¹ Subject to further input from our constituency, at this time we do not oppose the closure of Road 5400000, due to the low volume of whitewater boating use that occurs on Fish Creek and because the road has significant potential to affect the creek's outstandingly remarkable fishery, particularly after the recent fire disturbance. The upper section of this road was decommissioned following the 1997 flood. We request that if Road 5400000 is closed to vehicles that it specifically remains open year-round to non-motorized use including pedestrian and bicycle travel. This would provide access to Fish Creek for whitewater boaters, anglers, and other river users. Signage should be placed to make it clear to forest visitors that non-motorized use is still allowed.

We note that Road 5400000 is on the scoping list of roads proposed to be closed; however, it is not depicted on the scoping map.

[The fact that the proposed project analyzes Forest Service roads that intersect Highway 224 should not be used as a reason to continue the closure of National Forest lands along Highway 224 and the Clackamas River corridor.](#)

Highway 224 along the Clackamas River remains the only major state road still closed after the 2020 wildfires. Although the proposed project does not include Highway 224, it does include Forest Service roads that intersect with Highway 224. At present, these roads and the surrounding National Forest lands remain closed as well.

There is significant public controversy regarding the continuing closed status of Highway 224 now that danger tree mitigation and debris removal has been completed for the entire length of highway.² The fact that danger tree removal has not been completed on all Forest Service roads that intersect with Highway 224 should not be a reason for the Mt. Hood National Forest to continue to keep National Forests lands along the Clackamas River closed. The re-opening of the Clackamas River corridor's public land and waters is not dependent upon danger tree removal on Forest Service roads being analyzed in this project or that have been previously analyzed in the 2021 post-fire roads projects already authorized.

The Forest Service has already identified all fire-impacted roads and it should now reduce its closure order to focus only on the roads and developed recreation sites which still contain fire-related hazards while re-opening all other National Forest lands and treated developed

¹ For more information about whitewater boating on Fish Creek, see <https://www.americanwhitewater.org/content/River/view/river-detail/10445/main>

² See KPTV news video *Businesses in Estacada still struggling with Highway 224 Closure* at https://www.kptv.com/news/businesses-in-estacada-still-struggling-with-highway-224-closure/article_8338deec-7b46-11ec-98ec-7f03b3d5a315.html

recreation sites³ along the Clackamas River and other areas that can be accessed without using untreated, fire-impacted roads. The Forest Service may use its authority under 36 CFR 261.50 to close fire-impacted roads while re-opening unaffected and treated roads without needing to wait for the completion of an environmental assessment for other roads which may be permanently closed.

Ongoing road and National Forest closures are impacting rural communities and local outdoor recreation businesses, particularly those dependent upon the Clackamas River and its corridor.

In 2019, outdoor recreation in Clackamas County accounted for \$628,307,000 in trip-related spending, supporting over 7,000 jobs, and providing \$356,266,000 in GDP contributions.⁴ Since then, rural communities have been hard-hit by two consecutive years with extreme wildfires, the ongoing COVID-19 pandemic, and the effects of extreme weather such as the record heat wave of summer 2021. These factors have combined with others to cause a steep downturn in the county's recreation-based economic sectors, affecting business owners, workers, and residents.

The availability and access to outdoor recreation is integral to economic recovery in this area, yet ongoing road closures are directly and negatively impacting the economic recovery of the recreation economy in Clackamas County. Whitewater rafting outfitters are unable to accept reservations for the upcoming 2022 season because they do not know if the Forest Service will open National Forest lands and roads in the Clackamas River corridor or if Highway 224 will be reopened. Although Highway 224 is under the purview of the Oregon Department of Transportation and not the Forest Service, our correspondence with ODOT indicates that they are deferring to the Forest Service to address its roads and re-open the National Forest prior to the re-opening of Highway 224. This wait-and-see approach between the two agencies appears to be causing delay and, meanwhile, it is significantly impacting local businesses, workers, and the rest of the recreation-based economy that ripples outward.

As it relates to the proposed project, the Forest Service is proposing to use timber sale contracts as a primary tool for danger tree removal. Although they may not have significant up-front costs to the Forest Service, timber sales are not an expedient tool for danger tree removal and are not likely to get closed roads opened in a prompt manner. In fact, agency guidance in Forest Service Manual 7709.59 Chapter 40 (41.7) indicates that timber sales should be used as a tool only for the removal of hazards along NFS roads that are not considered time-critical. Further, the economic value of fire-killed trees decreases rapidly and often become almost valueless in the time it takes to analyze, prepare, and put up for a bid a salvage unit. How does the Forest Service propose to address danger trees along roads with timber sales once the trees have lost

³ The treatment of fire-related hazards at developed recreation and administrative sites was authorized under the 2021 Clackamas Fires Danger Tree Abatement Project. See Decision Memo, Clackamas Fires Danger Tree Abatement – Developed Recreation and Administrative Sites (signed August 17, 2021). Accessed January 31, 2022 at http://www.fs.usda.gov/nfs/11558/www/nepa/115185_FSPLT3_5658936.pdf.

⁴ Mojica, J., Cousins, K., Madsen, T., 2021. Economic Analysis of Outdoor Recreation in Oregon. Earth Economics. Tacoma, WA. Accessed January 31, 2022 at https://issuu.com/traveloregon2019/docs/economicanalysisofoutdoorrecreationinoregon_otc-ea.

their already marginal economic value? The Forest Service should be seeking other means by which to address roadside danger trees so that high priority roads can be opened more quickly.

Trees that are more than one tree-height downhill of a road should not be cut.

Although trees uphill of a road may fall or slide slightly further than one tree height toward the road, trees downhill of a road cannot. Without exception, rivers are downhill of roads and, by not cutting further than one tree height below the road, the project may reduce its impacts on streams and rivers and their riparian corridors while still fully meeting its purpose to mitigate hazards posed by trees that can strike the road. The distance downhill from roads should be measured slope-wise, not level with the horizon (i.e., map view) since this is the ground distance that a falling tree can reach.

Areas of different burn severity class have different conditions and treatment needs.

Oregon and its national forest lands have experienced a significant amount of high severity burn in the past three wildfire seasons. These areas have a high percentage of fire-killed and structurally damaged trees and consequently have a more critical need for treatment than do areas of low severity or moderate/mixed severity burn.

Fortunately, the prescription and marking needs for areas of stand-replacement fire are simpler than they are for areas of low or mixed severity fire. It is also less controversial to treat high severity burn areas than it is to treat other areas where healthy, fire-surviving trees are intermingled with killed or damaged trees.

There is likely much more work just within high severity burn areas than can reasonably be accomplished by this project, and the overwhelming focus of work should be directed to these areas. Low severity burn areas should be avoided altogether. Where roadside areas of mixed severity burn present public safety concerns, prescriptions should be developed that avoid cutting green trees and fire-surviving trees that fell and leave only legitimate hazard trees while treating their residual fuels.

Typically, fires burn at lower intensity along rivers and in the bottoms of stream drainages than they burn at the mid and upper slopes. Consequently, river and streams are often in areas that remain unburned or that burned at low severity. By differentiating treatments according to burn severity and by focusing on treatment of high severity burn areas, the project can reduce its direct impacts to rivers. For areas along rivers that did burn at high severity, the project should avoid all cutting of trees that are more than one tree height from the road for which the hazard tree treatment is being provided. There is significant ecological and scenic value to retaining fire-killed and damaged trees along rivers and streams and their removal should be an action of last resort and done only for legitimate public safety needs for a prioritized roadway.

Coarse woody debris should be retained but hazard trees should not be felled into rivers.

The ecological value of coarse woody debris is well-known, and fire is one of the primary processes that creates CWD in forest ecosystems. All large-diameter (>36") hazard trees that are cut should be limbed and left on the landscape to benefit natural fire-recovery processes.

Residual fuels from limbs should be piled and burned or, where appropriate, chipped to reduce future fire intensity and flame length.

Fire also serves as a primary process that results in the recruitment of large woody debris to streams and rivers. This is essential for aquatic ecosystem function and should be allowed to occur naturally in the post-fire environment. Danger trees should not be felled into rivers where they are likely to pose substantial hazards to river users, but riverside trees that naturally fall into rivers or streams over time should be regarded as providing ecological value.

The Forest Service should make project geospatial data available.

Given the large geographic scope of this project, it is difficult to provide a detailed assessment and comments without the ability to use computer-based mapping tools such as GIS analysis. The Forest Service should provide geospatial data for its proposed projects from the scoping stages forward on its project websites, without the need for a Freedom of Information Act request. Doing so will promote public engagement and assist the Forest Service with receiving detailed and substantive comments that can help improve agency projects. The Forest Service has not yet made this project's geospatial data available, and we look forward to it providing these data as soon as possible on the project website and no later than the release of the draft Environmental Analysis.

Conclusion

Thank you, again, for the opportunity to comment on this project.

Sincerely,



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