Results of Public Involvement for North Clack Integrated Resource Project

Many comments were received through scoping, field trips, meetings with collaborators and the 30-day comment period.

Some comments expressed support for the project while others did not like it or certain aspects of it. Comments were considered and used in various ways. Some generated incremental changes to the proposed action, others are addressed as alternatives to the proposed action that were considered, and some resulted in additional analysis and discussion in specialist reports. The sections below highlight a few of the key topics that arose.

Temporary Roads

Temporary roads are those roads that are built by timber contractors to access log landings and to facilitate efficient logging operations. After use, they are rehabilitated and closed as described in section 2.2.2.2. Some commenters suggested that temporary road construction be minimized, or eliminated altogether. Some pointed out that the proposed mileage is more than in previous projects on the Forest.

There are several reasons why the proposed action contains the new temporary roads that it does.

- The project area contains vast areas of second-growth timber that grew up after large fires. Previously, the stands were too young to be viable for stand management and they were deferred until now. Some of these areas are just now developing to the point where thinning and other treatments are viable. Since much of the area is in the C1 - Timber Emphasis land allocation, it is proposed to manage the stands in an operationally efficient manner with temporary roads as opposed to creating permanent system roads.
- The LaDee Flat OHV Management Plan identified some roads for motorized trail use and decommissioned others that were cut off. A substantial investment has been made on some of these routes to provide diverse motorized recreation experiences. The proposed action includes some new temporary roads to provide access for stand management that bypass or replace some of the roads that have been converted to motorized trails.
- Helicopter logging is one means to provide for vegetation management that would not require new roads, but it is very expensive and very fuel intensive. The option of helicopter logging is described in s. 2.1.1.1.
- The terrain in some areas is very variable with relatively steep slopes that would be logged with skyline systems interspersed with flat benches that would be logged with ground-based equipment. To access this terrain, roads are proposed on the slope breaks between these two systems.

After comments were received expressing concerns about temporary roads and the potential impacts they might create in terms of erosion, the interdisciplinary team calculated the potential for sediment to reach streams and reassessed the entire proposed action as it relates to roads.

Several incremental changes were made to the proposed action based on comments received. After examining each temporary road segment, some were shortened or eliminated for a total

reduction of about one mile. Since most of the modeled sediment would not originate from new temporary roads, changes were also proposed for other system roads which are described below.

Options for temporary roads are discussed at section 2.1.1, including consideration of eliminating them. The science that was cited by some commenters as well as other literature on the subject was considered.

System Road Management

The project area contains many roads that are part of the Forest's transportation system. Unlike temporary roads, system roads are managed over time to provide safe access to the forest. They may be closed to public use or open and maintained at various levels based on need and available funding. Some commenters suggested that more roads should be decommissioned while others suggested few if any roads should be decommissioned to provide access. The proposed action includes changes to roads based on the Forest-wide roads analysis that was refined by site-specific information in a project level analysis (s. 2.2.2.3, s. 3.2). Only those roads that were found to not likely be needed for future management were proposed for decommissioning. A detailed account of system roads in the project area is found in the North Clack Roads Table[1].

Roads are managed for safe access while minimizing impacts to resources. The proposed action includes many actions to repair and restore roads, and to address erosion and sedimentation issues (s. 1.3.2, s. 2.2.2). The following actions reduce modeled sediment contribution from system roads.

- Active and passive decommissioning of unneeded roads
- Road maintenance including blading, shaping, ditch cleaning
- Road closures with stormproofing, using techniques to minimize OHV intrusion
- Road redesign and repair, particularly on OHV dual-use routes
- Replacing poorly functioning culverts
- Project Design Criteria that address erosion and sedimentation

The rehabilitation of unauthorized OHV routes also results in important reductions of sedimentation to streams.

Some commenters suggested eliminating or reducing temporary roads and decommissioning system roads to reduce the sediment that they contribute to local streams. Since most of the modeled sediment originates from system roads (s. 3.3.3.3), changes were proposed for system roads which are described below. Some were suggested by public comment and others were proposed by interdisciplinary team members.

- Road 4613200 would be actively decommissioned after the junction with road 4613205. This road parallels the North Fork Clackamas River, and a more careful look at future needs for access found that Road 4613013 and an existing temporary road alignment would adequately access this part of the landscape.

[1] https://www.fs.usda.gov/nfs/11558/www/nepa/105362_FSPLT3_4630506.pdf

- Road 4613205 would be actively decommissioned at mile post 0.18. This road parallels and crosses Dry Creek, and a more careful look at future needs for access found that a new ridgetop temporary road in Unit 174 and one in Unit 179 would adequately access this part of the landscape.
- Road 4612130 would not be reopened as originally proposed, but would be left to continue to revegetate.
- Roads 4610 and 4610180 would receive additional work of stormproofing to reduce chronic sediment contribution. These segments of road (approximately 8 miles), would not be used for log haul or receive maintenance for log haul but would be stormproofed with drivable waterbars.
- On several roads, sediment modeling showed some concern for sediment production with log haul on native surfacing. To reduce sediment, rock would be placed on 4613016, 4613017, 4612140, 4610028 and 4614120.

The Forest completed a Transportation Analysis Report (TAR) and this project included a project-level analysis to refine the information in that report based on site-specific information. The roads that were retained on the system were found to be needed for forest management. Based on site-specific analysis and public involvement, some roads that were identified as not likely needed in the TAR were found to be needed, and some roads that were identified as likely needed were found to not be needed. These are summarized at section 2.2.2.

The science that was cited by some commenters as well as other literature on the subject was considered.

Regeneration Harvest

Regeneration harvest is proposed to provide a diversity of age classes across the landscape, to provide forest products, and to create forage for deer, elk, and other early-seral dependent species. Some commenters suggested that regeneration harvest be eliminated while others suggested the quantity be increased. Some don't like the term and prefer to call them clearcuts. Some questioned how the proposed quantity was determined, and why it couldn't be more, given the C1 – Timber Emphasis land allocation. On a related topic, some suggest more harvest in general while others want less.

The potential to increase regeneration harvest is complex and involves a number of factors.

- The Forest Plan encourages regeneration harvest in the C1 – Timber Emphasis land allocation, but it is also permitted in most of the B allocations.
- Much of the C1 – Timber Emphasis land allocation across the District is restricted by an overlay of Critical Owl Habitat. While the North Clack area represents 6% of the Clackamas River Ranger District it contains 27% the C1 allocation outside Critical Habitat.
- The Forest's current management strategy is to rotate through project areas and have a major planning effort for vegetation management once per decade to achieve the desired stand conditions over time. In other words, the North Clack project is not the only opportunity to create regeneration harvest because there will be another planning effort in this area in about 10 years.

- Within this land base, there are standards and guidelines such as FW-195 that suggest that a consistent quantity of early-seral conditions be created through timber harvest over time. Adding too much regeneration harvest now would not leave land available to create early-seral conditions in future decades.
- To manage the planning workload with limited staffing and funding, the Forest has chosen a path that does not involve harvest in inventoried roadless areas or in suitable spotted owl habitat because there is no compelling reason to do so at this time.
- Regeneration harvest is also constrained by the visual quality objectives associated with the North Fork Clackamas eligible Wild and Scenic River.

Options for regeneration harvest are discussed at section 2.1.2, including consideration of eliminating and increasing regeneration harvest. The science that was cited by some commenters as well as other literature on the subject was considered.

Climate Change

The proposed action would result in some carbon emissions and some carbon sequestration.

Some commenters suggested that if a quantitative carbon analysis were done, the results would convince the Forest Service to leave all trees in the forest to sequester the maximum amount of carbon on site. Still others suggest that the current Forest Plan is so out of date, that if it were to be redone now, it would recognize the benefit of carbon storage and eliminate all timber harvest.

Vast areas of the Forest are managed with no timber harvest and many other areas allow low levels of timber harvest where it is designed to accelerate old-growth characteristics. These include wilderness areas, late-successional reserves, designated critical spotted owl habitat, riparian reserves, wild and scenic rivers, the Bull Run watershed, congressionally withdrawn lands and administratively withdrawn lands. These areas, as well as areas managed for timber production, store vast amounts of carbon.

The project area contains lands identified in the Forest Plan and the Northwest Forest Plan that are allocated for sustainable timber production. Many of these same areas were congressionally allocated for timber management because they were part of the Oregon and California Railroad lands.

The analysis shows that the proposed action would result in stands that are healthy and resilient to the potential effects of climate change (s. 3.13).

It is not likely that a detailed carbon analysis would lead to changes to the proposed action or to the creation of other alternatives that achieve the purpose and need. A quantitative carbon analysis at the project scale would require many assumptions about methodology for which there is little consensus in the scientific literature. Requests to revise the Forest Plan to mandate maximum carbon sequestration on-site, are outside the scope of this analysis. The effects of taking no action are addressed in each resource topic in section 3. The Forest is managed for many uses and values. The elevation of on-site carbon sequestration above all other values is not appropriate for the project area. The science that was cited by some commenters as well as other literature on the subject was considered. See response to cited science document.

Snags and Legacy Trees

Some stands in the project area were burned many years ago. They contain varying amounts of legacy features that remain in the second-growth stands that grew up after the fire. These include large down logs, large snags, and large live trees with fire scars. The areas that were intensively logged before or after the fires have few or no legacy features. The proposed action includes the retention of large live trees, the retention of snags where safety permits, and the retention of a sufficient quantity of down wood.

Some commenters suggest that more needs to be done to protect these features and some suggest that allowing stands to grow on their own without any management intervention, is the best way to maximize the amount of snags and large trees now and in the future.

The analysis in the Wildlife Biological Evaluation and Specialist Report shows that no action would result in the most snags, but it also shows that the proposed action would result in a sufficient quantity over time to meet the needs of dependent species. In the future, if thinned stands are too healthy for trees to die on their own, snags can be created manually. The science that was cited by some commenters as well as other literature on the subject was considered.

Riparian Management

Riparian reserves are the areas adjacent to streams that are managed to promote riparian values including shade to keeps streams cool, a source of large wood recruitment to streams for the pools they create, and a late-successional stand of trees to provide habitat for riparian dependent species. The proposed action includes some thinning in the dry upland portion of the riparian reserves and no-harvest protection buffers along the streams.

Some commenters suggest that no treatment is the most appropriate thing to do in riparian reserves. They suggest that this would maximize trees dying on their own and falling into the stream. Other comments were received that supported active riparian management or suggested different buffer widths. Both sides provided science citations to support their positions.

The proposed action includes the manual introduction of large wood to certain streams. This strategy has been shown to more quickly get large wood structure into streams to create pools. In the future, if thinned stands are too healthy for trees to die and fall on their own, large wood can be felled toward streams or brought in from other areas. The analysis found that the proposed action was consistent with the Aquatic Conservation Strategy and the standards and guidelines for riparian reserves (s. 3.4.7).

The science that was cited by some commenters as well as other literature on the subject was considered.

Fire Hazard

The project area has been burned by severe stand-replacing wildfires in the past. Due to the adjacency of wilderness areas and residential areas (sometimes referred to as the wildland-urban interface), agency fire and fuel specialists were concerned and proposed several fuel reduction treatments (s. 2.2.1.6, s. 3.12).

Some commenters suggest that there is no fire hazard or that fires are natural and should be allowed to burn. Some commenters suggest that timber harvest operations will make the area more hazardous and more likely to burn. Some have questioned the need for fuel breaks.

The recent 36 Pit Fire demonstrated that the area can and does burn with intensity. However, the crown fire dropped to a low-intensity ground fire when it encountered thinned stands treated within two years prior to the fire. The thinning units reduced the fire behavior and fire spread due to the lack of fuel continuity and limited ladder fuels. The thinning units provided locations for fire-suppression forces to establish firelines.

The proposed vegetation management treatments and fuel treatments will result in a landscape with discontinuous fuel conditions and areas where fire-suppression forces can take appropriate action to contain fires. The Forest Plan requires a suppression response in this landscape.

The science that was cited by some commenters as well as other literature on the subject was considered.

Red Tree Vole

The red tree vole is a small mouse like mammal that lives most of its life in the canopy of trees. It is a survey and manage species; surveys to protocol were conducted, several nests were found and verified, and 94 acres of units were eliminated from the proposed action.

Since then, a citizen group has climbed trees in the project area and found more nests that were not detected in the survey because they could not be seen from the ground.

Several commenters want more tree climbing to occur and units deleted where appropriate. Some suggest that the agency has ignored the nests found by the citizen group and have even proposed additional regeneration harvest in stands with known nests.

Most stands with the highest likelihood of having red tree vole nests were eliminated from consideration in the early planning phase for the North Clack project. All old-growth stands and all stands considered suitable northern spotted owl habitat were excluded from harvest consideration and therefore have not been surveyed for red tree voles.

The Forest has contracted the climbing of additional trees consistent with draft survey protocols under development by USDA FS Region 6. Based on the information supplied by the citizen group, the District Ranger determined that additional climbing surveys were warranted to better assess the population of red tree voles in the planning area and to ensure appropriate conservation measures are implemented per established management requirements.

The proposed action and Alternative 2 were developed, and all of the effects analysis was conducted and written before the information from citizen groups was received and before agency surveys were conducted. Because nest trees had not yet been validated, no changes were made to either alternative based on unverified citizen information.

After analyzing and validating the information from contract surveys and citizen surveys, the proposed actions have been be adjusted to apply appropriate conservation buffers as described in the Survey and Manage standards and guidelines (2001) on page 24. The changes have been documented in a Red Tree Vole Report and in the Draft Decision Notice.