



7/21/10

Dear Ms. Estrom,

The following are Bark's comments on the Molalla River-Table Rock Recreation Area Management Plan's Environmental Assessment. We appreciate the opportunity to comment on this important matter.

Bark's mission is to transform 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. We work in collaboration with agencies, conservation groups, quiet recreation organizations, and concerned citizens to ensure appropriate management of the federal lands surrounding Mt. Hood. Bark is an active member of the Molalla River Alliance and is generally very pleased that the BLM is taking steps to more actively manage recreational activities in this area. Bark supports these efforts generally, but has some specific concerns about the preferred alternative. We look forward to your response to these comments and to seeing a final product that reflects the concerns raised by the various interested parties.

a. Campground Design

Bark is pleased that the proposed action provides for three campgrounds in order to consolidate impacts from camping and that the sites will retain a semi-primitive character. We also appreciate that amenities such as toilets will be provided to reduce the impacts of camping.

1. Campsites Should be Designed to Provide a Riparian Buffer

From the maps it appears that some of the planned camp sites are sited right on the river. We ask that you move these sites back and provide for trails to the river in order to reduce impacts such as trampling of riparian vegetation, loss of habitat, and erosion.

2. Drinking water and Greywater Facilities Should be Provided at Each Campground

Campground visitors who pay a fee to camp expect certain amenities and clean drinking water is one of them. Campers who expect this service will be surprised to find it is not provided and will either drive back to Molalla to purchase drinking water or drink river water and potentially jeopardize their health. We realize that providing water is an additional expense, but it is a crucial service that the BLM should provide.

In addition, you should provide for dishwashing stations, popular in many campgrounds, where campers can go to wash their tableware and dispose of the greywater in an appropriate manner. Without dishwashing stations and instructions on why it is important to follow them campers will wash their dishes in the river, causing significant impacts on water quality.

b. Trails and Day use areas

1. Increase Enforcement of Unlawful OHV Use

In August of 2010 Mount Hood National Forest expects to release its plan for managing off-highway (OHV) vehicles. The plan will prohibit cross-country OHV travel and limit OHV use to a handful of designated areas with labeled trail systems. It is possible that some OHV riders will be displeased with their new options and turn to the Molalla River-Table Rock area as a new area to ride OHVs. The BLM should step up its patrols and take swift action if any unlawful OHV trails are detected in order to ensure that this area does not become plagued with the problems associated with uncontrolled and unlawful OHV use.

2. Keep Trails and Trailheads Open Unless They are Causing Resource Damage

Throughout the plan you mention closing certain trails or trailheads due to lack of popularity. While it is understandable for the BLM to not prioritize trails unpopular access points, they should be kept open unless they are causing resource damage. It is very difficult to determine whether a trail is popular with the public, and it is possible that once this recreation plan is implemented they will become more popular. Where seasonal closures are determined to be necessary to avoid resource damage, they should be based on actual conditions and not pre-selected dates.

3. Maps and Information about Trails Should be Provided at Each Trailhead, Day Use Area and Campground

Bark commends your commitment to increasing the amount of information received by visitors through improved signage. However, because such signs are frequently vandalized, we urge you anticipate this activity and be prepared to replace signs as frequently as necessary. We anticipate that adequate restroom and trash facilities will be provided at recreation areas and where the BLM deems providing such facilities to be impossible we hope that you will use signs to inform people where the closest facilities are.

4. Target Shooting Should Be Closely Regulated

While this area is an established targeting shooting site, additional efforts should be made to regulate this activity. Target shooting is an activity that has substantial impacts on other forest users because it is a noisy activity that prevents other users from having a serene experience, it can cause other visitors fear for their own safety or the safety of their pets and children, and because of the litter associated with both the activity and this user group.

The final EA should contain a plan for managing these impacts. This could include closing access to Pinecrest Road earlier in the season and asking gun clubs and ammunition retailers to sponsor clean up days for the most popular shooting areas.

5. Suction Dredge Mining Should be Banned

The EA notes that suction dredge mining should be discouraged. EA at 38. Bark urges you to not just discourage but actually prohibit this activity. It is a highly impactful activity and has no place on the Wild and Scenic Molalla River. This activity is extremely threatening to aquatic habitat and would also adversely impact people who come to the river to recreate.

c. Overnight Camping Facilities Must be Provided for Equestrian Users

Equestrians have a significant history of use in this area. While they may not constitute the largest number of users, they use the area year round and have contributed substantial time and effort towards trail maintenance throughout the region. In addition, many equestrian users reside in the general vicinity of the project area and their buy in is crucial for the plan to succeed. This user group has been actively engaged throughout the process of developing this plan and is justifiably upset that their repeated request for camping facilities have been denied. Oregon Equestrian Trails have also volunteered to donate labor and materials to reduce the cost of their facilities. Equestrians have also

provided site specific suggestions and asked for a field tour to assist you in making an appropriate determination. The BLM needs to take additional steps to work closely with the equestrian community and meet the needs of this user group in an environmentally responsible fashion.

d. Conclusion

We appreciate your work and analysis on this important matter. If you have any questions about my comments, please do not hesitate to contact me at (503) 331-0374. I look forward to seeing a final plan that addresses our concerns.

Sincerely,

A handwritten signature in black ink that reads "Lori Ann Burd". The signature is written in a cursive, flowing style.

Lori Ann Burd
Restore Mt. Hood Campaign Manager/Staff Attorney
Bark