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.

Since 1999, Bark has organized people from communities around Mt. Hood National Forest to keep watch over the ecological conditions of the forest and the actions of the federal agency tasked with managing these public lands, the Forest Service.

https://www.facebook.com/barkformthood  @barkformthood
Land Acknowledgment Practice

As an organization founded by white people in the settler-colonial lineage, Bark is a part of the legacy of land theft and the erasure of Native authority over the lands now referred to as the “public lands of Mt. Hood National Forest”. As an organization, we have established influential relationships with the Forest Service, part of the same Federal government which facilitated the violent land theft, colonization, and displacement of Indigenous people. Non-native Barkers have access and privilege to this land because of this violent legacy. We are working to transform our organization, to take responsibility for this legacy and these unearned privileges. We are learning to practice acknowledgment, respect, and support for the Molalas, Kalapuyans, Chinookan Clackamas, Chinookan Wascos, Northern Paiute peoples, and Sahaptin-speaking peoples who live here and who have always lived here -- and the many other native nations who have always been part of and cared for this land that we now occupy.
Agenda

1. NEPA Overview
2. Comment Writing
3. Parts of an Environmental Assessment
4. Areas of Concern
   a. Wild and Scenic River Corridors
   b. Designated and Dispersed Recreation
   c. Scenic Values
   d. Cultural Resources
   e. Travel Management
What is NEPA?

● Public participation in planning process
● Disclosure of the action, alternatives, environmental effects, and mitigation
● Consideration of environmental impacts

Does not:
● Decide which alternative to choose
● Prevent environmental impacts from happening
● Prohibit any actions
Why participate in a NEPA process?

1) To **change** the project
2) To **preserve** the ability to sue
3) To **gather** information about the project
4) As a focus-point for **organizing** the public

The type of comments you write depends on the answer to the question above. So – **What is your reason?**
NEPA Process Timeline

Scoping
Submit your comments

30 days

Preliminary Environmental Assessment (PA/EA)
Submit your comments

30 days

Draft Decision / Proposed Action
Submit your formal objection

45 days

Objection / Resolution
Agency must publish Objection Response Letter and hold a meeting (upon request) with Objectors to resolve objections, or explain why not
Public Comments

Comments should focus on:

○ the “Purpose and Need” of the proposed action
○ proposed Alternatives or lack thereof,
○ the quality of the assessment of the environmental impacts
○ proposed mitigation or lack thereof

Substantive comments:

○ provide new information about the Proposed Action, an alternative or the analysis
○ present a reasonable alternative /identifies a different way to meet the need
○ point out a specific flaw in the analysis
○ suggest alternative methodologies and the reason(s) why they should be used
○ make factual corrections, or identify a different source of credible research which, if used in the analysis, could result in different effects
Parts of an Environmental Assessment

**Written by the agency**

- **Purpose and Need** - describes what they are trying to achieve. Explains to the reader why an agency believes an action is necessary, and serves as the basis for identifying the reasonable alternatives that meet the purpose and need.
- **Proposed Action** - describes what the agency is proposing to do (log, build roads, in stream restoration, etc)
- **Action Alternatives** - other versions of the action
- **Existing Conditions and Environmental Consequences**
- **Supporting Documents** - Specialist Reports, Forest Management Plans

**Not (always) written by the agency**

- **Applicable Regulations** - Laws
- **Scientific Support** - research that validates the analysis
The “Wild and Scenic” Salmon and Sandy Rivers
The Wild and Scenic Rivers Act (1968) requires management actions to protect and enhance the Outstandingly Remarkable Values (ORVs) for which the river was designated and to protect a river’s free-flowing nature. The ORVs for the Salmon River are scenery, recreation, fisheries, wildlife, hydrology, and botany/ecology (Salmon River Management Plan 1993). ORV’s for the Sandy River are scenery, recreation, fisheries, geology, and botany (Upper Sandy River Management Plan 1994).

- Have they thoroughly analyzed all the possible impacts to the ORVs in the WSR corridors?
- Have they shown that the project meets the requirements of the Wild and Scenic Rivers Act?
- Does the project protect and enhance the ORVs in the Wild and Scenic River corridors?
- Are they proposing to do something they shouldn’t or neglecting to do something they should?

Compare the direction given in the Mt. Hood Forest Management Plan regarding their recreation management goals and how to manage WSRs and the direction given in the two Wild and Scenic River Management Plans, to their “proposed action” for the Zigzag Timber Sale.

You can make recommendations to change the project so that it focuses on meeting the goals for recreation and WSR management by simply pointing out what their own plans already say.
Wild and Scenic Salmon River Corridor

“Five proposed units are located either entirely or partially within Segment 1 of the Salmon Wild and Scenic River. This portion of the Salmon River is classified as recreational.

Salmon River units: “forest thinning to promote late-successional forest (old growth) characteristics. This would result in a more open appearance in treated stands and eventually larger tree diameters and increased species diversity. Proposed units are not in proximity to developed facilities, trails or other recreation amenities. Impacts to hiking, fishing, and winter sports activities are not expected. Two temporary roads would be utilized to access units, one would be new and the other would utilize a previously decommissioned road. Project design criteria require decommissioning and restoration of temporary roads once project implementation is complete.

(EA section 3.2.2)
Upper Sandy Wild and Scenic River corridor

Three helicopter log landings and two smaller service landings will be located within Segment 2 of the Upper Sandy Wild and Scenic River. Segment 2 of the Upper Sandy Wild and Scenic River is also classified as recreational.

Proposed activities are located within recreational segments of the Salmon and Sandy Rivers where road access and shoreline development are expected to occur and adhere to relevant standards and guidelines. While impacts in the form of closures are expected to occur for some recreation resources, these will be short-lived. Lasting impacts to the recreation as a result of proposed actions are expected to be negligible.

Impediments to recreation values as a result of proposed actions within the Salmon Wild and Scenic River and Upper Sandy Wild and Scenic River corridors are expected to be minimal.

(EA section 3.2.2)
Developed Recreation Facilities

What does the Mt. Hood Forest Plan have to say about Developed/Designated Recreation sites (A10)?

We want to ensure they have properly disclosed the likely impacts AND that the project is following the directions and goals of relevant management guidelines.
According to the Environmental Assessment developed recreation sites that will be impacted are:

- **Trillium Lake** (Mud Creek Area)
  - Weekday, off-season recreationists could experience temporary closures. Closures would ensure public safety while harvest related activities occur.
  - Access to Trillium Lake via Road 2656 would be restricted for up to two weeks preceding the annual winter road closure (December 1st or when snow amounts limit access, whichever comes first).
  - Closures or otherwise restricted access to developed recreation sites are not expected during the May-September operating season.

- **Lost Creek and McNeil Campgrounds, Riley Horse Camp** (Horseshoe Area)
  - ???
Dispersed Recreation  Outdoor recreation that takes place outside developed recreation sites or the Wilderness.

“Those looking to dispersed camp, collect forest products, hunt, or fish within the planning area could experience restricted access within and in proximity to active units and on access roads while harvest activities commence. Roads accessing some areas would be utilized as haul routes and harvest related activity could be perceptible to those visiting dispersed areas on weekdays.

“Within the planning area dispersed camping is most popular in the vicinity of Old Maid Flats and near Trillium Lake.”

“Improved access is also expected as a result of proposed actions. Road maintenance and reconstruction activities are anticipated to occur on many roads that access dispersed recreation areas and proposed harvest units within the planning area.”
Trails

Forest Management Goals (Mt. Hood Forest Plan)

Impacted Trails

• Trillium Lake Loop Trail #761

• Kinzel Lake Trail #665

• Hunchback Trail #793 (east trailhead)

• Jackpot Meadows Trail #492

• Salmon River Trail #742 (east trailhead)

• Dry Fir Trail #674A

• Burnt Lake Trail #772

• Frenches Dome Trail #776C

• Horseshoe Trail #774

26. Provide a broad range of year-round, high quality dispersed recreation opportunities in an undeveloped forest environment.

27. Maintain a Forest trail system designed, located, managed and maintained to consider users needs and other resource values.

28. Provide a Forest trail system for year-round use, including winter trails in snow zones consistent with other resource values.

• Veda Lake Trail #673

• Eureka Peak Trail #671

• Cast Creek Trail #773
“Three trails transect harvest units: Jackpot Meadows (unit 180), Veda Lake (unit 196), and Eureka Peak (unit 190). Equipment crossings on Veda Lake and Eureka Peak Trails would result in temporary disturbances to trail corridors and closures. One temporary road would cross Jackpot Meadows Trail resulting in short-term impacts to trail tread and temporary trail closures. Project design criteria (PDCs) require trail segments impacted by temporary road and equipment crossings be rehabilitated to previously existing conditions. Decreased density of forest canopy is also an expected result of forest thinning activities and a more open appearance may be perceptible to those utilizing trails that transect units after harvest has occurred.”
Pacific Crest Trail

“Pacific Crest Trail (PCT) ran through the northeast section of unit 96. The PDC’s that are in place for this project will protect the trail with a 100-foot no-harvest protection buffer that will be maintained as a vegetative screen for this trail system.”
Top Spur Trailhead (What other trails/trailheads are in need of maintenance?)

“Relocating the Top Spur Trailhead approximately 2,000ft beyond its current location on Forest Service Road 1828-118 and the associated trail reroute would greatly reduce unwanted riparian impacts and increase overall trail sustainability. The impetus for this project stems from the current trail alignment and trailhead location which are entirely within a riparian area. The current Top Spur Trail alignment is straight uphill along and across Clear Fork, a headwater of the Sandy River. This has resulted in problematic drainage, poor trail sustainability, and created undesirable impacts to water quality and riparian function in a drainage that hosts listed species under the Endangered Species Act.”

Interestingly, they are proposing to log hundreds of acres on the steep slopes above the Clear Fork, but those impacts were found to be “insignificant”.
Scenery

The Forest Service has established the Visual Management System (VMS) for management of visual resources. It classifies landscapes according to their natural variety and public sensitivity. The VMS inventory process results in all forest lands having recommended Visual Quality Objective. (VQO)
- VQO: Preservation (P) / SIO: Very High = The valued landscape character should be intact with only minute if any deviations. The existing landscape character and sense of place should be expressed at the highest possible level.

- VQO: Retention (R) / SIO: High = The valued landscape character should appear intact. Deviations may be present but must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident.

- VQO: Partial Retention (PR) / SIO: Moderate = The valued landscape character may appear slightly altered. Noticeable deviations must remain visually subordinate to the landscape character being viewed.

- VQO: Modification (M) / SIO: Low = The valued landscape character may appear moderately altered. Deviations may begin to dominate the valued landscape character being viewed but should borrow valued attributes such as size, shape, edge effect, and pattern of natural openings, vegetative type changes, or architectural styles outside the landscape being viewed.
Project Design Criteria

“The more that the surrounding landscape’s dominance elements are reflected through the integration of scenery PDCs into treatment activities, the less that such activities would dominate and negatively impact the landscape’s scenic integrity. Similarly, the indirect effects of the proposed action, such as negative alterations to Forest visitors’ perceptions of landscape character and sense of place, would be minimized by the scenery PDCs.”
Cultural Resources

“Effects Determination

The only heritage resources within the proposed project area is a rock feature (669EA073). Site 669EA073 is a rock feature which was determined not to be eligible to the National Register of Historic Places (NRHP). The site is located within unit 120 in the Mud Creek Planning area. The site consists of 13 basalt boulders on the edge of a small butte. All the boulders are smaller than 30cm in circumference. They did not appear to be placed in a certain design or fashion, just placed in a pile. I was unable to relocate this rock formation during the current survey. The site was deemed ineligible at the time of documentation in 1997. No protective measures are required or recommended for ineligible sites. Although the new ground disturbance would occur, no known cultural resources would be impacted by this project. In compliance with Section 106 of the National Historic Preservation Act, the agency has conducted an assessment of adverse effects (36CFR 800.5) and determined that the proposed project meets the criteria for a ”No Historic Properties Affected” determination and is subject to stipulation III.B.2 of the 2004 Cultural Resource Programmatic Agreement.”
Transportation Management

While restricted access to other developed recreation facilities within the planning area is not anticipated, roads accessing these sites would be utilized as haul routes and harvest related activity would likely be perceptible. Weekday recreationists visiting other recreation facilities outside of operating season could experience logging related traffic and activity.

While temporary closures are anticipated short-term impacts to some developed recreation facilities, improved access is also expected as a result of proposed actions. Road maintenance and reconstruction activities are anticipated to occur on many roads that access recreation opportunities and proposed harvest units within the planning area. For additional information on USFS system roads within the planning area, refer to the Transportation Specialist Report.