



Clackamas
Stewardship
Partners

*Restoring the Watershed,
-Putting people to work*

Date: April 18, 2016

From: Clackamas Stewardship Partners
Robert Roth, Facilitator
18683 Joyce Ct.
Oregon City, OR 97045

To: Jackie Groce, District Ranger
Jim Roden, NEPA Coordinator
Clackamas River Ranger District
595 NW Industrial Way
Estacada, OR 97023

Re: Clackamas Stewardship Partners comment letter on the Hunter Integrated Resource Project and Proposed Action dated March 18, 2016

Dear District Ranger Groce and NEPA Coordinator Roden,

The Clackamas Stewardship Partners (CSP) is a group of diverse stakeholders with a common goal of enhancing ecosystem health and economic viability of local communities within the Clackamas River Basin. We are committed to a collaborative process that employs stewardship contracting and other innovative tools to meet restoration goals.

This letter represents a majority of the CSP partners who support resource management projects included in the Proposed Action for the Hunter Integrated Resource Project as described in the scoping letter. CSP member organizations that chose not to sign on to this letter may not support everything in this letter or have time constraints that prevented members from securing formal support from the organizations they represent. Organizations may communicate their comments or dissention separately.

CSP would like to thank Clackamas River Ranger District staff for providing members with numerous opportunities to collaborate with the U.S. Forest Service (USFS) in the development of the Proposed Action for the Hunter Integrated Resource Project. USFS staff helped organize and conduct Hunter field trips with CSP members and guests on June 9 and August 11 2015. These events included project orientations , site visits and discussions between USFS staff and CSP members.

USFS staff have also attended CSP General Meetings throughout 2015 and 2016 to provide formal presentations and regular updates. Forest Service staff have also discussed this project with CSP members by email, calls and CSP monthly meetings. CSP appreciates the Clackamas River Ranger Districts efforts to encourage this collaboration.

CSP members have indicated overall support for the following Hunter Project components:

Vegetation Management

Transportation System Management

In addition to the proposed actions identified in the Transportation System Management section a majority of voting CSP members approved the following recommendations:

- **4600 -330 This loop road that accesses at least 6 dispersed camping sites has low maintenance costs and should be left open. CSP members encourage the Forest Service to consider other options to reduce road maintenance costs.**
- **4600-350 The Bump Lake road that accesses Bump Lake needs brushing, grading and water bars.**
- **4691 Fish Lake Rd. has running water on its surface and needs simple grading and perhaps water bars. There is a side road off 4691 that access Si (?) Lake that is in bad condition and should be evaluated.**
- **4670 -220 and 4670-031(confirm) Access to Mt. Lowe should not be closed off. There is a great multiple peak vista fro Mt. Lowe and access to popular the Rho Ridge trail. A camping spot may be located at the end of 4670-031.**

Aquatic/Riparian Habitat Management

CSP supports the inclusion of culvert replacement projects to improve fish passage including the Pot Creek culvert on FSR46 and Lowe Creek culvert on FSR4672. The Pot Creek crossing has rearing areas above and below the culvert which is currently impeding fish passage. The Lowe Creek culvert is unstable and is a likely source of sediment. CSP members also support placement of large woody debris in streams such as Lowe and Pot Creeks where it is lacking to improve complexity and aquatic habitat.

Stewardship Contracting

CSP supports the use of stewardship contracting to implement resource management projects included in the Hunter Integrated Resource Project. The exchange of goods for services and the retained receipts generated by stewardship contracting are effective tools for accomplishing resource management projects both on and off forest which improve forest health and support local / regional economies.

Please contact me if you have any questions.

Sincerely,

Robert Roth
CSP Facilitator

Riparian Habitat Improvement

CSP supports the inclusion of culvert replacement projects to improve fish passage including the Pot Creek culvert on FSR46 and Lowe Creek culvert on FSR4672. The pot Creek crossing has rearing areas above and below the culvert which is currently impeding fish passage. The Lowe Creek culvert is unstable and a likely source of sediment. CSP members also support the placement of large woody debris in streams to improve complexity and aquatic habitat.

Forage Area Management

As conifers, shrubs and invasive species encroach in forage openings less browse opportunities are available for deer and elk. Invasive plant control, pruning / cutting back shrubs and removing invading conifers in these areas will increase the quantity and quality of forage available for these species. We support this activity.

System Roads

We support the proposed changes to system roads that will contribute towards the goals of “right-sizing” the road system by decommissioning, closing, and storm proofing both closed and open roads that have been deemed not needed by the USFS.

There are several roads identified in the Forest Service’s Travel Analysis Report as “likely not needed” but are kept in the system through the Hunter Project The Forest Service is encouraged to consider these roads for closure:

- 4660-140 – Breached berm, “Decommissioned” as part of Increment 2 currently labeled on Hunter maps as open
- 4660-170 – Breached/circumvented berm, “Decommissioned” as part of Increment 2 currently labeled on Hunter maps as open
- 4651-130 – Accesses Big Bottom wilderness and includes culvert in the wilderness area
- 4680-124, 4680-125 – Upper reaches Fall Creek (LSR)
- 4640 at Switch Creek (LSR)
- 4650-012 - Granite Creek tributary crossing

These roads are currently closed, but need expanded closures:

- 4660-120 – “Decommissioned” as part of Increment 2 currently labeled on Hunter maps as closed, needs larger berm or other barricade to prevent further attempts at breaching
- 5731120 - “Decommissioned” as part of Increment 2 currently labeled on Hunter maps as closed, has been circumvented by OHV, needs enhanced closure

CSP members appreciate the standardization of the term decommissioning which serves to clarify the status of roads in this classification. Spraying invasive species in infested rock piles with herbicides will decrease the rate of their expansion. Within this project area CSP members recommend the graveling and grading on FSR 4691 and 46350.

Recreational Use Management

We encourage the inclusion of projects that will better manage and enhance the recreational uses of the area including dispersed camping areas that have contributed to soil erosion and compaction.