

MAY 17 1988

BEFORE THE BOARD OF COUNTY COMMISSIONERS

FOR MULTNOMAH COUNTY, OREGON

In the Matter of Multnomah)	
County's Review of the)	RESOLUTION
Proposed Land and Resource)	# 88-82
Management Plan for the)	
Mt. Hood National Forest)	

WHEREAS, the Mt. Hood National Forest includes a substantial portion of Multnomah County's rural land area; and,

WHEREAS, many of the resources derived from national forest lands are important to the lives and livelihood of Multnomah County's citizens; and,

WHEREAS, on May 3, 1988, a briefing on the Proposed Land and Resource Management Plan for the Mt. Hood National Forest was presented to the Board of County Commissioners by Forest Service personnel; and,

WHEREAS, The Board of County Commissioners directed the staff of the county's Department of Environmental Services, Division of Planning and Development, to conduct a review of the proposed forest plan and to formulate a response,

THEREFORE, BE IT RESOLVED THAT, Multnomah County hereby adopts the attached review and recommendations as its official response to the Proposed Land and Resource Management Plan for the Mt. Hood National Forest.



Adopted May 26, 1988
BOARD OF COUNTY COMMISSIONERS
FOR MULTNOMAH COUNTY, OREGON

BY Gladys McCoy
Gladys McCoy, Chair

Approved

by Laurence Kressel
Laurence Kressel
Multnomah County Counsel

Multnomah County has reviewed the Proposed Land and Resource Management Plan and Draft Environmental Impact Statement for the Mt. Hood National Forest. The proposed Forest Plan documents, along with the maps designating various management areas for the different alternatives, were carefully examined in the context of existing Findings and Policies contained within the County's Comprehensive Framework Plan (CFP).

As required by State law, the Framework Plan was developed and formulated with substantial citizen participation. The Plan's Findings and Policies reflect the many value judgements and collective decisions made by the citizens of Multnomah County during the course of the Plan adoption process.

We wish to respond to the proposed Mt. Hood National Forest Plan with regard to the following issues and concerns:

1. Overall Consistency with Comprehensive Framework Plan

Local Comprehensive Plans are addressed in two places within the Forest Plan documents (DEIS, Chapter III; DEIS, Appendix H). The Forest Plan correctly points out that Multnomah County's Comprehensive Framework Plan "calls for the encouragement of economic development including industries which process natural resources" (DEIS, III - 102). There is insufficient recognition, however, of other CFP Findings and Policies directly related to the full range of land and resource management strategies possible on the Mt. Hood National Forest.

Due to the predominately urban population of the County, other resources take precedence in the public perception of the value of national forest lands. The Comprehensive Framework Plan reflects this emphasis on the so-called "amenity values" of recreation and scenery, as well as more tangible nontimber forest resource uses such as wildlife habitat and domestic watersheds.

Forests provide recreation, water retention, erosion control, wildlife habitat and visual relief for urban areas (CFP-I, P. 19).

One of the most valuable assets of the County's forests is the opportunity for recreation in close proximity to the metropolitan area. Opportunities exist for camping, hiking, hunting, picnicking, sight-seeing, photography, and other pursuits. With energy considerations becoming more important, the resources close to urban areas could become of much greater value for recreation. (CFP-I, P. 139).

These Findings are reinforced in the County's Policy document. It is Multnomah County's policy to "encourage the development of recreation opportunities by other public agencies" (Policy 39, CFP-II, P. 173).

Highlighting the County's desire for greater attention to the forest's scenic and recreational resources is a recent official action by the Board of Commissioners adopting tourism as the County's regional strategy in response to the Governor's Regional Economic Development Strategy Project (Resolution #88-85, adopted April 5, 1988).

The Preferred Alternative (Alternative E) set forth in the Forest Plan attempts a balanced, multiple-use strategy toward the resources of the Mt. Hood

National Forest, and yet incorporates a "departure" timber harvest which violates the principles of long term sustained-yield management. This is justified in the Plan in the interests of maintaining "community stability".

The County's position is that this "balanced approach" should not apply equally to all areas of the forest. The Forest Plan should reflect a geographic relationship to a particular user group. Where communities have demonstrated a need for timber or other commodity resources, the management designations of those forest lands nearby should be a response to that need. Likewise, the forest lands within Multnomah County should be allocated primarily for those resources most useful to the citizens of the County. This sort of approach would truly represent a "balanced consideration of all resources in the land management process" and one which would have the effect of "maximizing overall net public benefits". As the Forest Plan's Economic Impact Analysis has concluded: "Generally, those groups or communities who view or use the forest from an amenity standpoint are positively impacted by amenity-oriented alternatives and negatively affected by those alternatives with a commodity emphasis" (DEIS, Appendix B, P. 85).

Of the more than one million acres which comprise the Mt. Hood National Forest, approximately 72,000 acres (only 7%) are located within Multnomah County. Most of this area is set aside as the Bull Run Watershed and is closed to all public access. For the remaining forest lands within Multnomah County, in order to be consistent with established County policy, resource uses other than timber production must become the focus for management.

2. Larch Mountain Area

The Larch Mountain area is rich in scenic and recreational resources. The scenery visible from the summit of Larch Mountain was accurately portrayed by a recent editorial in The Oregonian as "one of the finest views in Oregon" (Oregonian, 4/15/88).

Aesthetic awareness of this area, moreover, has always been keen. Sam Lancaster, the engineer responsible for the Old Columbia River Highway, wrote in 1926:

"Larch Mountain has been called Nature's Grandstand, for such it appears to be in all reality. There is no better viewpoint from which to look on Nature's wondrous beauties as revealed in the rugged, tree-clad Cascade Range. From the summit of Larch Mountain the whole creation round about for many miles is seen in all directions."

- S.C. Lancaster, The Columbia, America's Great Highway Through the Cascade Mountains to the Sea, 1926, p. 127.

This book goes on to describe the dense network of recreational trails in the area.

Multnomah County has long been an advocate for scenic resource protection in the Larch Mountain Area. In 1939 the County constructed the Larch Mountain road to provide public access to the viewpoint. Several years later, land was acquired along both sides of this road expressly for scenic purposes. Today

the Larch Mountain Corridor is a four-mile long linear parkway extending westward from the National Forest boundary.

Concern for this area is still strong. On May 5, 1988, the Board of Commissioners adopted a Resolution calling for Special Interest Area (A-4) designation for all forest lands within the Columbia River Gorge National Scenic Area (copy attached).

3. Bull Run Buffer Area

Multnomah County is opposed to the C-1 Timber Emphasis given to the Bull Run Buffer in every alternative of the proposed Forest Plan. We realize that chargeable timber harvest is allowed by law for this area outside the watershed's hydrologic boundary but within the designated Planning Unit. Full Timber Emphasis for this geographic sliver, however, is not compatible with surrounding resource allocations.

The Columbia Wilderness was created by Congress in 1984, and is contiguous to the buffer for nine miles. It is our understanding that language contained within the Senate Background Report to the 1984 Wilderness Act stipulates that this segment of the buffer remain in an "unregulated" condition, precluding timber harvest.

Further south, the Pacific Crest Trail extends for nearly six miles through this buffer strip. While selective cutting may enhance views and vistas from the Trail, the roads required for logging this area are certainly an unwarranted conflict with this national recreational resource.

For the entire buffer area, it seems clear that the economic benefit derived from the relatively small amount of timber available for harvest would not offset the negative impacts caused by logging. And, since this area is technically closed to public access, we suggest devising a special Category A Management Area within the Forest Plan's Preferred Alternative.

4. Corbett Watershed

The Corbett Water District draws its water for domestic use from the headwaters of Gordon Creek. There are intakes situated on both the North Fork (primary watershed) and the South Fork (secondary watershed). National Forest lands within these watershed areas include nearly all of Section 31 and most of Section 32, T1N, R6E; and most of Section 6 and the Northwest quarter of Section 5, T1S, R6E. A map recently provided to the County by the Oregon Department of Environmental Quality is attached.

The Draft Environmental Impact Statement for the Forest Plan includes a map showing the Corbett Watershed (DEIS, III-12), but the corresponding management category for municipal watersheds (B-6) was not applied to this area in the Preferred Alternative. It is our understanding that this stretch of upper Gordon Creek is classified as a Class I stream, affording some measure of protection. Nevertheless, we question whether this is adequate recognition of

the need to ensure provision of high quality drinking water for the Corbett Water District. We assume that the B-6 Management Area designation was developed for just this purpose, and would suggest its application here.

5. Wildlife

As identified within the Comprehensive Framework Plan using maps provided by the Oregon Department of Fish and Wildlife, a portion of a critical big game habitat area (elk and deer winter range) is located within the National Forest to the south of the Corbett Watershed discussed above. The area in question encompasses the SW 1/4 Section 6 and the NW 1/4 Section 7, T1S, R6E. Rather than the C-1 Timber Emphasis management category proposed under the Preferred Alternative for this area, we would support a B-9 "Wildlife Visual" management designation.

The application of the B-9 category to this area would provide quality habitat components such as forage, browse, and sufficient cover required by these animals; the C-1 Timber Emphasis would not. The Draft Environmental Impact Statement cites two examples of areas that "have been extensively harvested and now contain large expenses of sapling-size timber. They do not provide a desirable mixture of wildlife habitats because they lack hiding and thermal cover. Because cover is not available, animals do not come to eat the generous amount of browse growing in the areas. When the stands mature, cover will become abundant. But then the cover will shade out grass and forbs, and once again habitat diversity will be far below optimum" (DEIS, III-31). Silvicultural techniques required by the management directions of the B-9 category should prevent these undesirable conditions.

Other critical habitat areas identified on the County's Comprehensive Plan are located within the Columbia River Gorge National Scenic Area. We assume the A-4 Special Interest Area designation proposed for forest lands within the Scenic Area will ensure adequate protective measures for wildlife resources.

Another wildlife issue of concern to the County is the Larch Mountain salamander. Although considered neither "threatened" nor "endangered", the Larch Mountain salamander has been listed as a special interest species in the 1975 Forest Service publication Research Natural Area Needs in the Pacific Northwest (p. 222). The Oregon Natural Heritage Program relates that the salamander is "endemic to the Columbia River Gorge" and is "unique because of his restricted distribution" (ONHP, Multnomah County Data Summary, December, 1976).

The Draft Environmental Impact Statement identifies the Larch Mountain salamander as a "sensitive species" (DEIS, III-32). Management Directions outlined in Chapter 4 of the Forest Plan maintain that "threatened, endangered, or sensitive species, and habitat for those species, shall not be adversely affected" (Proposed Forest Plan, 4-26). But as the DEIS points out, "Because little is known about the requirements of the Larch Mountain salamander, the Forest has no management plan for its habitats" (DEIS, III-34).

The Preferred Alternative designates areas comprising much of this species' suspected range as C-1 and B-2, management categories permitting timber harvest. We are concerned, therefore, that this animal and its particular habitat requirements may be adversely affected before anything more is known about them. We suggest that a monitoring and evaluation program specific to the

Larch Mountain salamander be established. Funds and personnel resources should be allocated to further study, and specific monitoring directions should be spelled out in Chapter 5 of the Forest Plan, similar to the way indicator species have been addressed.

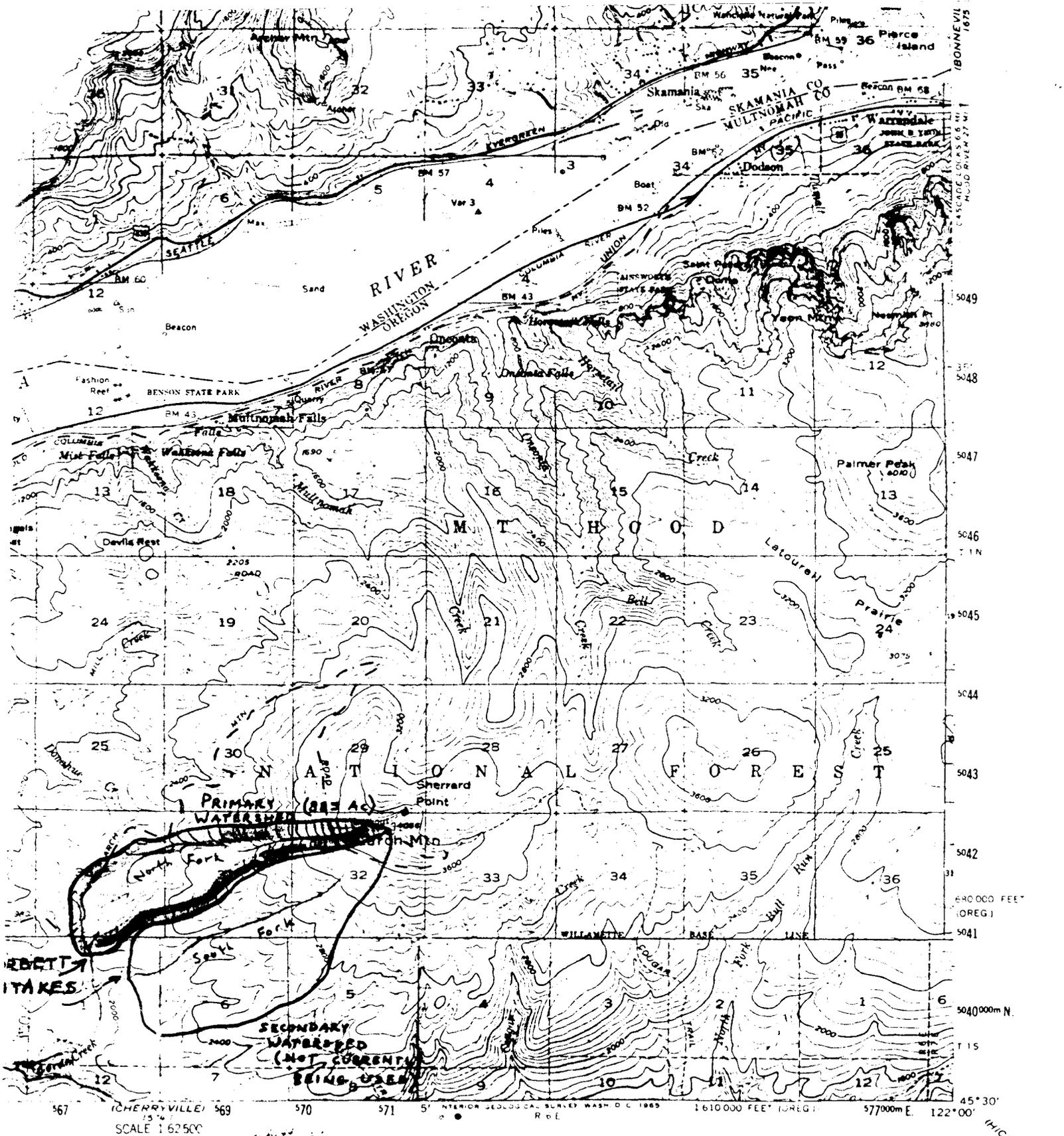
6. Old Growth Forest

We note with great interest the designation of an area under Alternative H as A-7, "Old Growth". This area within Multnomah County is located just inside the western boundary of the National Forest in Sections 19, 30, 31, T1N,R6E; and Section 6, T1S,R6E. Alternative E, the "Preferred Alternative", has no A-7 management areas at all, which seems to indicate a lack of balance for this alternative considered to be "a balanced approach" to forest resource management.

The County strongly recommends the incorporation of at least some portion of this A-7 management area into the Forest Plan. At the point where the Larch Mountain Road crosses the national forest boundary, Forest Road #1509 heads south into the heart of the area designated as A-7 under Alternative H. There is a great opportunity here for public education and for fostering awareness of the workings of a forest ecosystem. Keep in mind that Larch Mountain Road is a paved County-maintained parkway lined on both sides for four miles up to this point by the Larch Mountain Corridor. These stands of old-growth are probably the most accessible on the entire forest, and would serve as ideal examples of this fast disappearing environment. Preserving these remnants would fulfill all of the potential activities listed for this management area: "walk-in dispersed recreation, habitat improvement projects for fish and wildlife, and educational or interpretive activities". A short series of self-guided nature trails could easily be constructed from pull-outs along Forest Road #1509. By linking this area with the existing Larch Mountain Corridor and the scenic viewpoint at the summit, a multi-faceted and highly educational recreation resource is created for the considerable number of visitors using this portion of the Mt. Hood National Forest. Proposals for the protection of other non-timber resource values (there is some overlap, for example, with the Corbett Watershed discussed earlier) would be entirely consistent with these management directions. For these reasons, we urge you to consider designating this area as A-7, Old-Growth.

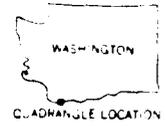
Multnomah County appreciates the opportunity to offer these comments on the Proposed Land and Resource Management Plan for the Mt. Hood National Forest, and we look forward to maintaining our involvement and coordination in the forest planning process.

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ROAD CLASSIFICATION

Heavy-duty	—————	Light-duty	—————
Medium-duty	—————	Unimproved dirt
	———	U.S. Route	State Route



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WATERSHEDS - CORBETT WATER DISTRICT