



Preliminary Environmental Analysis Developed Recreation Site Concessionaire Permit

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of
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Mt. Hood National Forest Clackamas, Hood River, and Wasco Counties, Oregon

For Information Contact:

Malcolm Hamilton
16400 Champion Way
Sandy, Oregon 97030
503.668.1792
mhhamilton@fs.fed.us



Keeps Mill Campground, Mt. Hood National Forest

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CHAPTER 1 - PURPOSE AND NEED FOR ACTION

1.1 Introduction

The Mt. Hood National Forest (Forest) proposes to issue special use permits to concessionaires for operation and maintenance of 28 developed recreation sites currently managed by the Forest Service. The Mt. Hood National Forest has used concessionaires to manage many of the Forest's developed recreation sites for over 15 years with considerable success. This proposal includes developed recreation sites throughout the Forest; they are described in Table 1.1. Figure 1.1 is a vicinity map for the Forest. Figures 1.2 through 1.5 are maps of the developed recreation sites being considered for concessionaire operations.

Table 1.1. Mt. Hood National Forest Developed Recreation Sites in Proposed Action

<i>Name of Site</i>	<i>Site Type</i>	<i>Location (Lat/Long)*</i>	<i>Ranger District</i>
Badger Lake	Campground	45.30496° / 121.55537°	Barlow
Bagby	Campground	44.95400° / 122.16900°	Clackamas River
Bagby	Hot Springs	44.93500° / 122.17400°	Clackamas River
Barlow Creek	Campground	45.23600° / 121.62765°	Hood River
Barlow Crossing	Campground	45.21788° / 121.61291°	Hood River
Big Eddy	Day-Use	45.18200° / 122.17000°	Clackamas River
Black Lake	Campground	45.61800° / 121.76000°	Hood River
Bonney Crossing	Campground	45.25674° / 121.39205°	Barlow
Bonney Meadows	Campground	45.26548° / 121.58286°	Barlow
Camp Cody	Cabin Rental	45.22400° / 121.38200°	Barlow
Clackamas Lake Guard Stn.	Cabin Rental	45.09900° / 121.75100°	Zigzag
Clackamas Lake Compound	Cabin Rental	45.09900° / 121.75100°	Zigzag
Clear Creek Crossing	Campground	45.14641° / 121.58593°	Barlow
Cloud Cap Saddle	Campground	45.40247° / 121.65505°	Hood River
Eightmile	Campground	45.40625° / 121.45793°	Barlow
Forest Creek	Campground	45.17979° / 121.52461°	Barlow
Keeps Mill	Campground	45.15395° / 121.52040°	Barlow
Knebal Springs	Campground	45.43583° / 121.48022°	Barlow
Little Badger	Campground	45.28209° / 121.34802°	Barlow
Little John	Campground	45.37100° / 121.56700°	Hood River
Lower Eightmile Crossing	Campground	45.41361° / 121.44371°	Barlow
McCubbins Gulch	Campground	45.11671° / 121.49380°	Barlow
Pebble Ford	Campground	45.40024° / 121.46362°	Barlow
Rainy Lake	Campground	45.62600° / 121.75883°	Hood River
Spring Drive	RV Campground	45.11500° / 121.51900°	Barlow
Tilly Jane	Campground	45.39997° / 121.64772°	Hood River
Wahnum Lake	Campground	45.57731° / 121.79247°	Hood River
White River Station	Campground	45.19984° / 121.60107°	Barlow

* GPS Latitude/Longitude Coordinates are decimal/degree format (WGS-84 map datum)

This document includes a preliminary analysis of effects of operating and maintaining these recreation sites for the next ten year period. Two alternatives are considered in detail, the proposed action and no action.

1.2 Document Structure

This Proposed Action and Preliminary Analysis are written to fulfill in part the purposes and requirements of the National Environmental Policy Act (NEPA), as well as to meet policy and procedural requirements of the USDA Forest Service. The intent of NEPA, its implementing regulations, and Forest Service policy is to evaluate and disclose the effects of Proposed Actions on the quality of the human environment. The document is organized into the follow parts:

Chapter 1: Purpose of and Need for Action: This section includes information on the history of the project proposal, the purpose and need for action, and the agency's proposal for achieving that purpose and need. This section also details how the Forest Service informed the public of the proposal and how the public responded.

Chapter 2: Alternatives, including the Proposed Action: This section provides a more detailed description of the Proposed Action (Alternative B) as well as the No Action Alternative (Alternative A). This discussion also includes design criteria that are part of the proposal.

Chapter 3: Environmental Consequences: This section describes the environmental effects of no action as well as the trade-offs and effects of implementing the Proposed Action. This analysis is organized by resource area.

Chapter 4: List of Prepares and References: This section lists the personnel involved in the preparation of the analysis and the reference material used.

Additional documentation, including more details of the developed sites may be found in the project planning record located at the Mt Hood National Forest Headquarters Office in Sandy, Oregon. The Forest Service will use all of this information as well as the comments received from the public and other agencies during the 30 day comment period to prepare an Environmental Assessment (EA). The Deciding Officer, the Forest Supervisor for the Mt. Hood National Forest, will then make a decision on the proposal based on the information in the EA.

1.3 Background

The Forest began using concessionaires to manage many of its developed recreation sites in the early 1990s based on direction outlined in the Mt. Hood National Forest Land and Resources Management Plan, as amended (referred to as the Forest Plan). Specifically, the Forest Plan states on page Four-36 the following for its strategy for developed recreation:

“Based on a forest developed site priority study, sites which are little used or not economical to operate may be closed. Existing facilities are improved to a standard level, and a limited number of popular sites are to be expanded. All facilities are operated at standard service level and are expected to be physically maintained over the planning horizon.

During the past decade the Forest developed sites have been operating in a downward spiral. Maintenance has not kept up with the deterioration of facilities. In order to protect the public’s investment in the Forest developed sites, the Forest plans to complete the identified backlog of developed recreation rehabilitation needs in the first decade. Some new sites may be constructed towards the end of the decade. Any new sites should be coordinated with SCORP demand projections and coincide with the high and medium growth activities.

Developed campgrounds and other developed sites will continue to be offered for operation by concession. The potential to operate specific sites by concession shall be evaluated in terms of the costs and benefits to the Government. Contracting some essential services associated with developed site management, such as garbage collection and sewage disposal, shall continue.”

In response to the deterioration of developed recreation sites and Forest Plan direction, the Forest first issued concessionaire permits in the late 1990s for the operation of 71 sites. These sites are currently operating successfully under concessionaire permits. The sites are clean, well maintained with functional facilities and are operated in an efficient manner. The concessionaire is responsible for cleaning and maintaining facilities, managing the reservation system, collecting fees, providing information to campers, and enforcing campground rules. The Forest Service is responsible for overseeing concession operations. Concession permit fees are used to replace aging and worn-out facilities.

Concessionaires bid on a prospectus and are selected based on five criteria: proposed operating plans; business plans, business experience and references; fee to the Government; fees charged to the public; and ability to implement Granger-Thye fee offset projects. Successful bidders customarily receive special use permits for a five year term that can be extended non-competitively for an additional five year period.

Forest Service recreation budgets have continued to decline; and it has become increasingly difficult to operate and maintain the remaining developed sites on the Forest (those not currently under concession management) using past practices. All of these sites are popular with the recreating public. Most were originally developed because the scenic environment or water features historically drew people to the sites. However, their remoteness and small size present management challenges.

In 2007, the Forest conducted a Recreation Facility Analysis in order to make strategic decisions on where to focus the limited recreation budget. All of the Forest’s developed recreation sites were evaluated and ranked based on conformance to the forest niche and amount of recreation use, financial efficiency, and environmental and community

sustainability. One result of the process was a recommendation that all sites currently under concessionaire operations would remain so. The Forest also recommended that most of the remaining developed recreation sites be managed in some other way or be closed due to low use, management costs, and/or extensive deferred maintenance. For a majority of the sites, it was recommended that there be a change to concession, partner or volunteer operation. Table 1.2 describes the recommended management changes for developed recreation sites in this analysis.

Table 1.2. Past and RFA Management of Mt. Hood National Forest Developed Recreation Sites in this Analysis. The 2007 Recreation Facility Analysis (RFA) 5-Year Action Plan includes recommended future management regimes for all National Forest developed recreation sites.

<i>Name of Site</i>	<i>Site Type</i>	<i>Past Management</i>	<i>RFA Management*</i>
Badger Lake	Campground	FS Recreation	F8, H3
Bagby	Campground	FS Recreation	C1, F8, G1, H1
Bagby	Hot Springs	FS Recreation	H1
Barlow Creek	Campground	FS Recreation	C2, H2
Barlow Crossing	Campground	FS Recreation	C2, H2
Big Eddy	Day-Use	FS Recreation	A1
Black Lake	Campground	FS Recreation	D3, D4, E6, K1, K2
Bonney Crossing	Campground	FS Recreation	C2, H2
Bonney Meadows	Campground	FS Recreation	C2, H2
Camp Cody	Cabin Rental	Administrative Site	N.A.
Clackamas Lake Guard Stn.	Cabin Rental	FS Recreation	C1, I4
Clackamas Lake Compound	Cabin Rental	Administrative Site	N.A.
Clear Creek Crossing	Campground	FS Recreation	C2, H2
Cloud Cap Saddle	Campground	FS Recreation	C2, H2
Eightmile	Campground	FS Recreation	C2, H1
Forest Creek	Campground	FS Recreation	C2, H2
Keeps Mill	Campground	FS Recreation	C2
Knebal Springs	Campground	FS Recreation	F16
Little Badger	Campground	FS Recreation	C2
Little John	Campground	State Snopark	N.A.
Lower Eightmile Crossing	Campground	FS Recreation	D3, D4, E6, K1, K2
McCubbins Gulch	Campground	FS Recreation	C2, H2
Pebble Ford	Campground	FS Recreation	C2, D3, D4, E6, K1, K2
Rainy Lake	Campground	FS Recreation	D3, D4, E6, K1, K2
Spring Drive	RV Campground	Administrative Site	N.A.
Tilly Jane	Campground	FS Recreation	NC1
Wahnum Lake	Campground	FS Recreation	NC1
White River Station	Campground	FS Recreation	C2, H2

*** Key to RFA Management Codes:**

- A1 – Decommission
- C1 – Increase Season of Operation

- C2 – Reduce Season of Operation
- D3 – Remove Restroom Facility
- D4 – Remove Tables and Grills
- E6 – Reduce Service
- F8 – Add a Host Site(s)
- F16 – Improve Access for Horse Trailers
- G1 – Construct a New Site
- H1 – Change to a Concession Operation
- H2 – Operate Through a Partner Agreement
- H3 – Volunteer (increase use of volunteers at the site)
- I4 – Increase Current Fee
- K1 – Change in Development Scale
- K2 – Change in Site Type
- NC1 – No Change – currently USFS operated
- N.A. – Not Applicable (not included in Recreation Facility Analysis)

The RFA recommended that some developed recreation sites be managed through partner agreements or by volunteers (see Table 1.2). In 2008, the Forest made a concerted effort to enlist partners and to recruit volunteer hosts for these sites. Campgrounds were advertised in Workamper News. Interest groups were contacted. These efforts were unproductive.

The RFA recommended that a few sites be decommissioned (see Table 1.2). The Forest considers this recommendation to be an action of last resort. As previously stated, the sites were originally developed because the scenic environment or water features historically drew people there. Removing facilities and managing the sites as part of the general forest does not change the fact that people will disproportionately continue to use the sites. High levels of public use at undeveloped sites present other management challenges (untreated human waste, accumulation of litter, accelerated erosion and loss of vegetation). The Forest is including these sites in the proposed action to both protect the environment and to continue offering developed facilities.

Three of the sites proposed for concession management (Clackamas Lake Compound, Camp Cody, and Spring Drive) have not been managed for public recreation use in the past. They are administrative sites that are no longer needed for National Forest administrative purposes. They are included in the proposed action because they would help fill a niche in the spectrum of developed recreation sites offered by Mt. Hood National Forest. A fourth site, Little John, is managed as an Oregon State Snopark during winter. It is under-utilized during the summer; and managing it as a group campground would also help fill a gap in the Forest’s portfolio of developed sites.

1.4 Desired Conditions

The following statements represent the desired condition for development recreation from the Forest Plan:

“Provide a broad range of year-round, high quality developed recreation opportunities.”
(pg. Four-4)

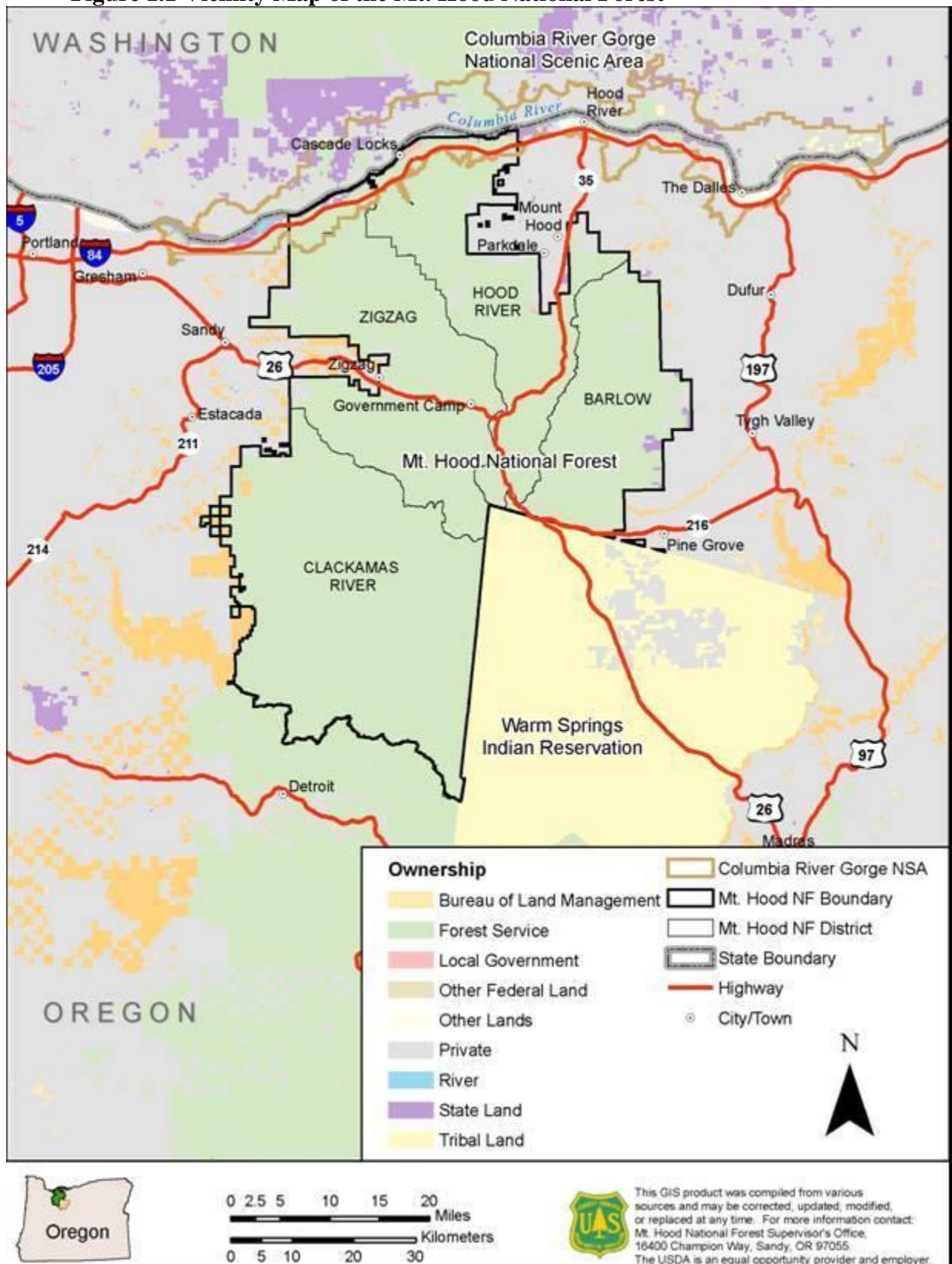
“Recreation in the Forest 50 years from now will depend to a significant extent on sites privately developed and operated. As demands for winter sports, organizational activities and overall developed recreation opportunities increase, they will be met by concessionaire or permittees.” (pg. Four-10)

1.5 Purpose of, and Need for Action

The purpose of this proposal is to allow for these 28 developed recreational sites to remain open to the public for their use and enjoyment, and to provide safe, clean, affordable, functional facilities in a cost efficient manner.

Action is needed because current recreation budget and staffing levels are insufficient to maintain these sites in a quality manner. Action is needed because budgets and staffing levels are not expected to increase and without additional resources these sites could deteriorate to a point where they would need to be closed to the public. Action is needed to provide a more consistent and sustainable mechanism to maintain these resources in a clean and functioning condition.

Figure 1.1 Vicinity Map of the Mt. Hood National Forest



1.6 Proposed Action

In response to the need for action discussed above, this proposed action involves issuing a special use permit(s) for concession operation and maintenance of the developed recreation sites listed in Table 1.1. The term of the permit(s) would be for five years with an option to extend the permit(s) another five years non-competitively if the permittee operates at a sustained satisfactory level.

The concessionaire(s) would be responsible for hiring, training and supervising an adequate number of paid campground hosts to collect fees, provide campers information, clean and maintain facilities, and gain compliance with campground rules and regulations with a “Good Host” approach. The concessionaire would be responsible for hiring a maintenance staff, provide them with vehicles, tools and materials. A complete list of maintenance requirements for developed recreation sites appears in the campground concession prospectus and appendices. The concessionaire would be responsible for managing the campground reservation system through the National Recreation Reservation System (NRRS).

The concessionaire(s) would be required to pay the U.S. Government a percentage of gross receipts. Under Granger-Thye (G-T) fee offset authority, these funds could be used to perform “landlord maintenance” and replace worn out facilities such as toilets, tables, fire rings, water systems, and other infrastructure and improvements. Ground disturbing activities in this action would be limited to replacement of fire rings, barrier posts, picnic tables, bulletin boards and patching of parking pads. More substantial ground disturbing activities that may be needed for future management will be analyzed separately as the projects are planned.

Concessionaire Special Use Permit(s) would be monitored by a Forest Service permit administrator for compliance with the Annual Operating Plan(s) and permit terms. Examples of an operating plan and the standard concessionaire permit are available for review on the Mt. Hood National Forest’s website until January 18, 2011 at <http://www.fs.fed.us/r6/mthood/campgroundprospectus.shtml> (after 1/18/2011 these documents are available for public review in the Analysis File at the Headquarters Office in Sandy, Oregon).

The proposed action is an administrative change that does not involve any modification of facilities or infrastructure or any substantial ground disturbing activities. All of these sites currently exist and management would continue under existing policies and regulations.

Figure 1.2 Developed Recreation sites in central part of Mt. Hood National Forest

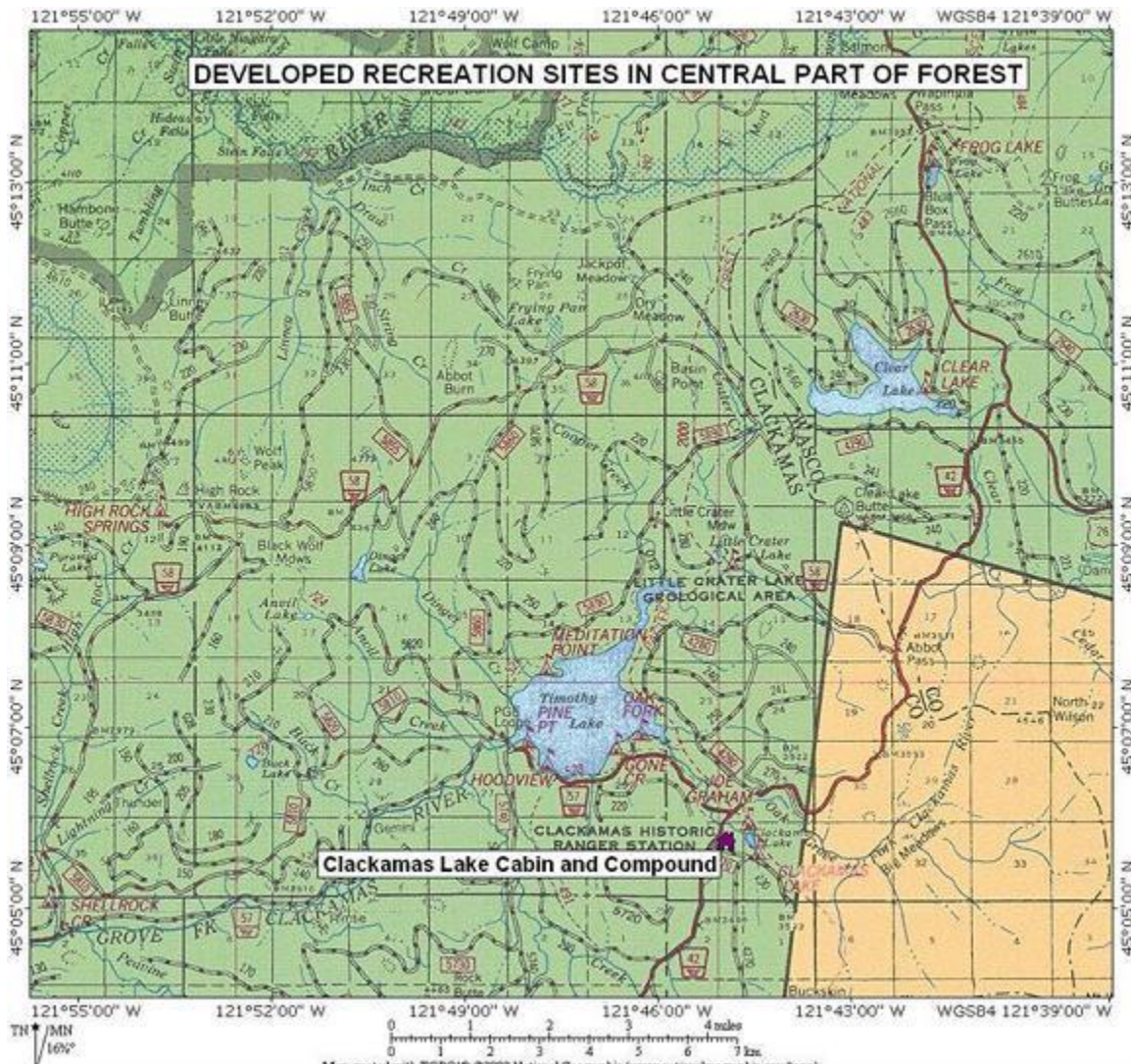


Figure 1.3 Developed Recreation Sites along Clackamas and Collowash Rivers

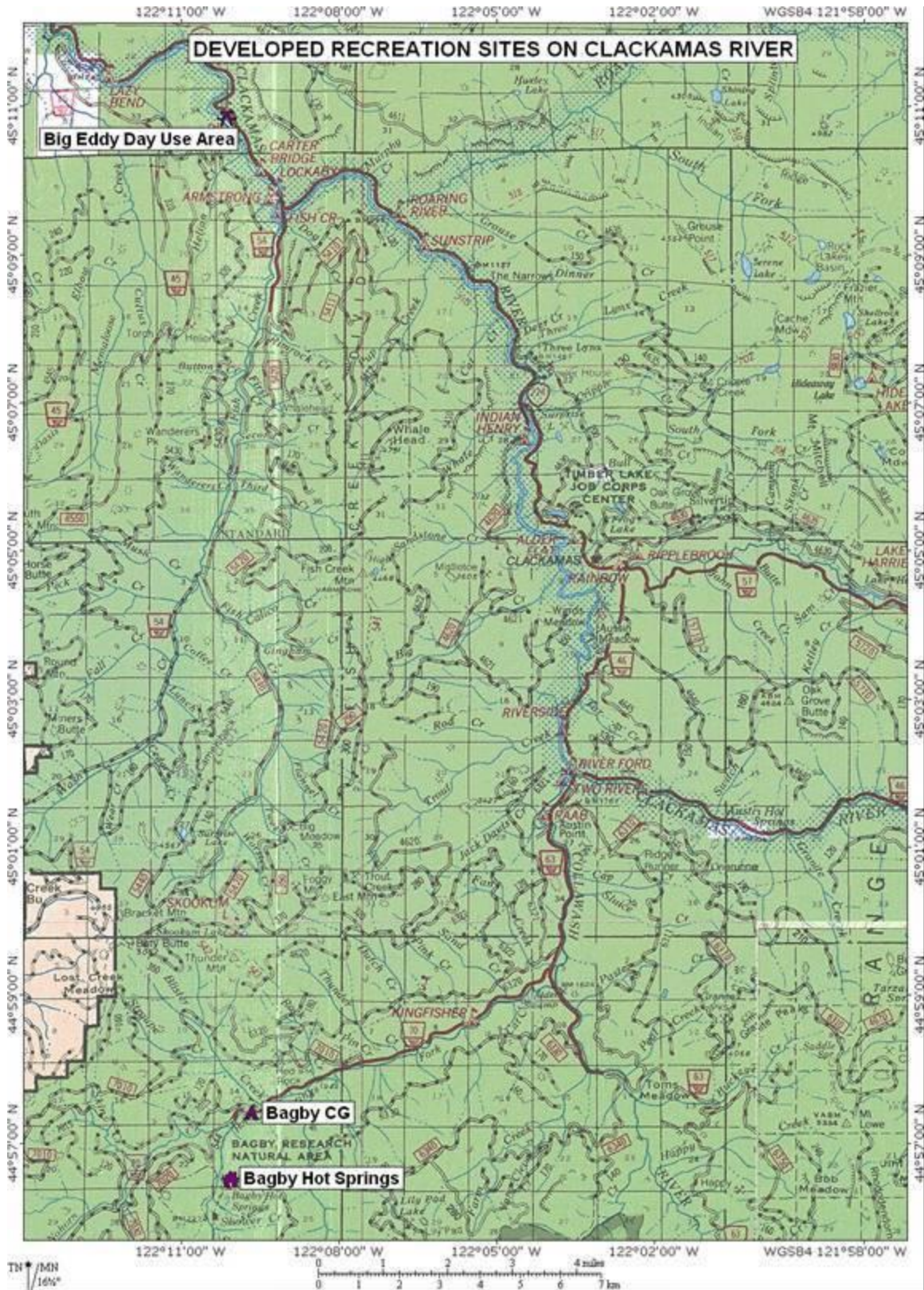


Figure 1.4 Developed Recreation Sites in southeast corner of Mt. Hood National Forest

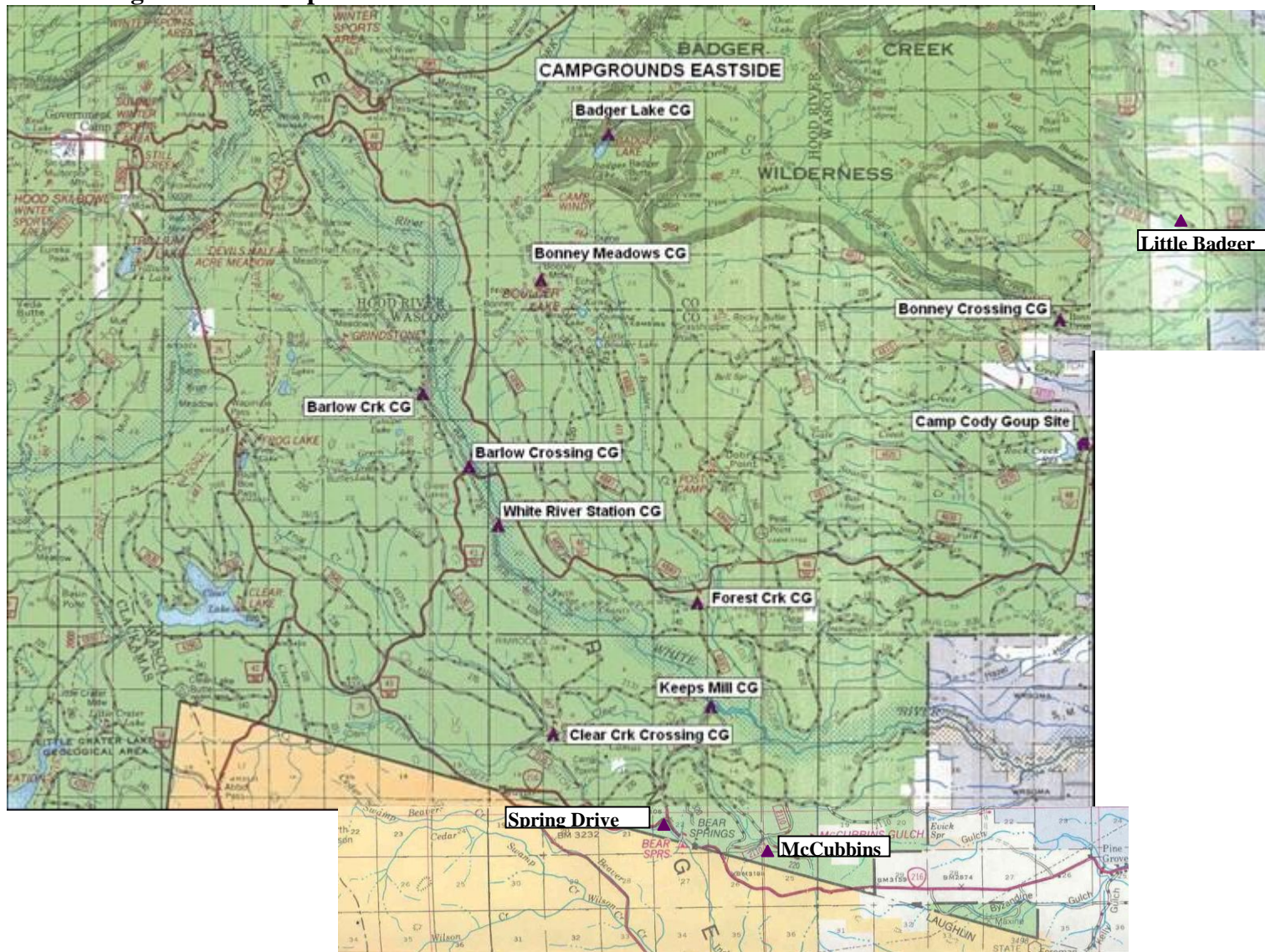
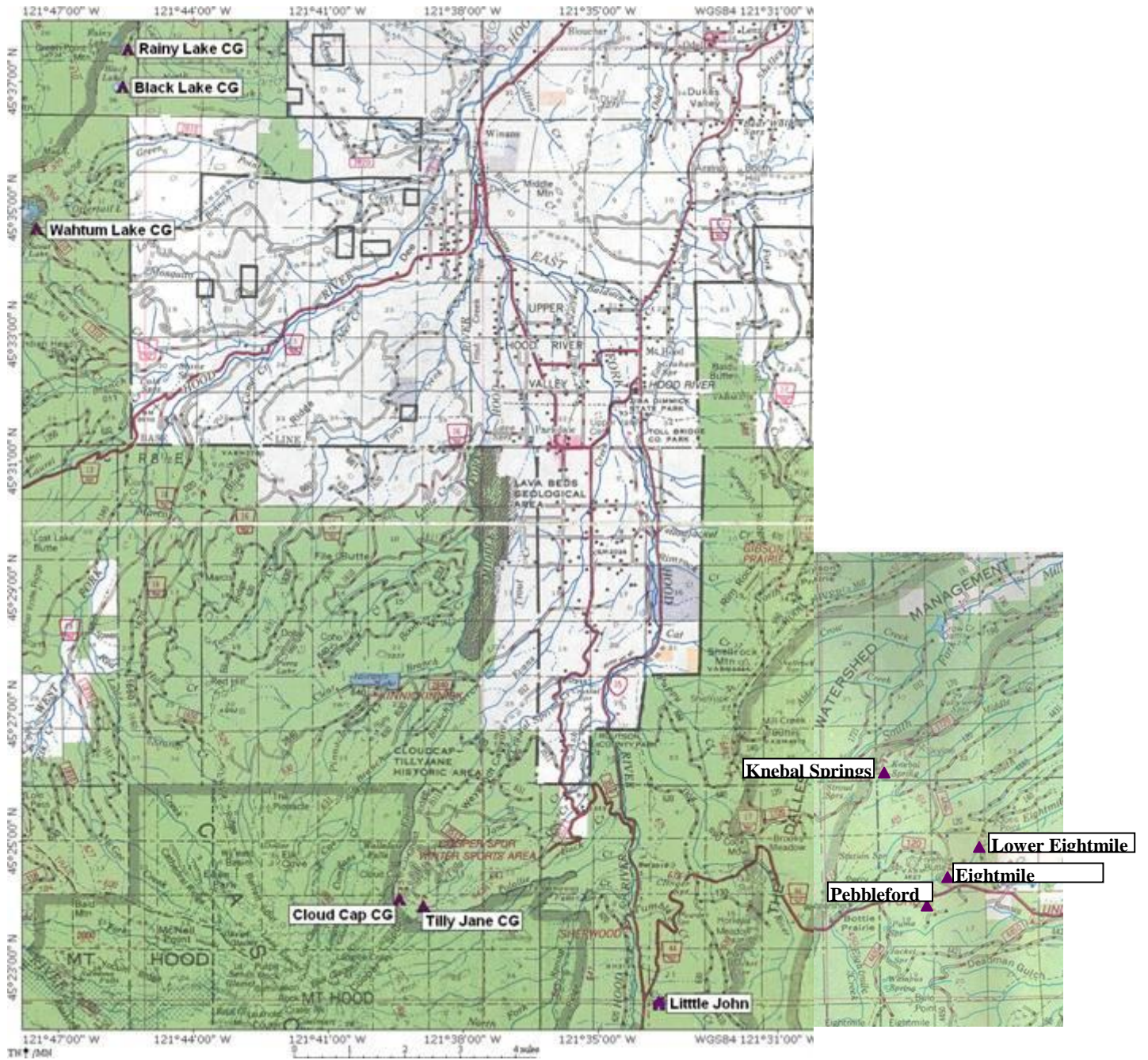


Figure 1.5 Developed Recreation Sites in northeast corner of Mt. Hood National Forest



1.7 Decision Framework

The Responsible Official for this project is the Forest Supervisor for the Mt. Hood National Forest. Based on the analysis in the environmental assessment, and considering the public comments received during scoping and the public comment period, the Responsible Official will decide whether:

- To issue a concessionaire special use permit(s) as proposed;
- To select and modify an alternative; or
- To take no action at this time and continue to manage these 28 developed sites with Forest Service volunteers and staff.

1.8 Management Direction

The Proposed Action has been designed to meet the goals and objectives of the documents listed below. This analysis is tiered to the Environmental Impact Statements listed below, which are incorporated by reference:

- The *Mt. Hood National Forest Land and Resource Management Plan* as amended (referred to as the Forest Plan) (USDA Forest Service 1990). The Forest Plan contains standards and guidelines applicable to this project. Consistency will be addressed in each resource section.
- The *Mt. Hood National Forest Land and Resource Management Plan Final Environmental Impact Statement*. This document discusses environmental effects for Forest-wide programs and sets the stage for project level analysis.
- The Forest Plan was amended by the *Record of Decision and Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl* (referred to as the Northwest Forest Plan or NWFP) (USDA & USDI 1994). The NWFP contains standards and guidelines for Matrix, Riparian Reserves and Late-Successional Reserves. Consistency will be addressed in each resource section.
- The *Northwest Forest Plan Final Supplemental Environmental Impact Statement* as amended. This document discusses environmental effects for Region-wide programs and sets the stage for project level analysis.
- The Final Environmental Impact Statement for Site-Specific Invasive Plant Treatments for the Mt. Hood National Forest and Columbia River Gorge National Scenic Area in Oregon, including Forest Plan Amendment #16. (USDA Forest Service 2008)

1.9 Public Involvement

The proposal was initially listed in the spring, 2010 (issued April 1, 2010) in the Schedule of Proposed Actions (SOPA), posted on the Forest website at <http://www.fs.fed.us/sopa/components/reports/sopa-110606-current.pdf> (after 1/18/2011 this documents can be found at http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_036387.pdf). The proposal was also included in the summer (July 1, 2010), fall (October 1, 2010) and winter (January 1, 2011) editions of the SOPA.

In response, the Forest received approximately 500 emails and a letter from Bark and Cascadia Law P.C. The comments centered on Bagby Hot Springs and the desire to not see this area put under a concessionaire permit. The following table summarizes the scoping comments that were received along with how they are being addressed in this analysis.

Area of Concern	Issue	Response – how this issue is addressed in the analysis
Bagby Hot Springs	<p>Small Organizations like the NW Forest Conservancy whose resources go into professional staff that are trained to oversee volunteers and work together with the Forest Service are essential to finding real solutions to recreation use on Mt. Hood National Forest.</p> <p>Separate Bagby from the forestwide campground contract and allow for groups like NW Forest Conservancy and other companies who have experience in managing hot springs to come in and provide a range of alternatives.</p>	<p>Not including the Bagby developed recreation site in a concessionaire permit is already within the range of alternatives being considered. The Deciding Officer has the discretion to not include in a permit any of the developed recreation sites currently being considered. If this were to occur, the Forest could continue to manage Bagby using a combination of agency staff, volunteers, and/or organizations where appropriate.</p> <p>Setting aside the Bagby site to be managed by a specific entity or company thru a non-competitive process would not be consistent with Federal policies and regulations regarding concessionaire permits. This is addressed further in Chapter 2 of the analysis.</p>
Decision Timeline	Host a public open house and comment period in the next six months to allow the public to weigh in on the challenges and range of solutions to Bagby Hot Springs.	An open house is scheduled for January 18, 2011 to afford the public an opportunity to discuss their concerns with agency staff. Also there will be a 30 day comment period on this proposal when the proposed action is published in the Oregonian. This is also scheduled for January 2011.

	<p>Complete the environmental assessment and comment period that the SOPA lists as “in progress” before making a decision on which company is awarded the campground concessionaire special use permit.</p> <p>Bagby Hot Springs is an icon of Mt. Hood National Forest. The recent changes should not have been made without any public comment, environmental assessment or engagement by the hundreds of volunteers who keep Bagby's spirit alive. The privatization and drastic changes to Bagby cannot happen behind closed doors. I demand you open a public comment period and host an open house for the public's voice to be heard on the future of Bagby.</p>	<p>No five year special use permits would be issued to a concessionaire for any of the 28 developed sites in this analysis until the environmental analysis has been completed and the Deciding Officer makes a decision.</p>
Volunteers	<p>Maintaining volunteers is critical to continuing regular reporting by users on the conditions of a site. This information provides accuracy to the updates that other visitors are searching for. And this volunteer knowledge is important to maintaining consistency. Volunteers don't just go away at the end of a contract.</p>	<p>We agree. The Forest values it's current volunteers and will continue to use volunteers in the future to help monitor and improve recreational facilities.</p>

CHAPTER 2 – ALTERNATIVES

2.1 Alternatives

This chapter includes a description of the range of reasonable alternatives developed to respond to the need for actions described in Chapter 1. The alternative of no action and the Proposed Action is detailed and compared to distinguish clearly alternatives for both the decision-maker and the public. Also described in this chapter are other alternatives considered and the design criteria that would be implemented to minimize or prevent adverse effects of road decommissioning.

2.1.1 Alternative A: No Action

Under the No-Action Alternative, the Forest would initially continue to manage the 24 existing developed recreation sites described in Table 1.2 through a combination of Forest volunteers and paid staff. Fees would continue to be charged under the authority of the Federal Lands Recreation Enhancement Act (REA) also known as the “Recreation Fee” program that allows the Forest to keep 95% of the fees collected to cover operation and maintenance costs. Any new fees or increase in fees would need to be reviewed by the Pacific Northwest Recreation Resource Advisory Committee, and their recommendations would be submitted to the Regional Forester for concurrence.

Under the No-Action Alternative, ground disturbing activities would be routine repair and maintenance of recreation sites and facilities such as replacement of fire rings, barrier posts, picnic tables, bulletin boards and patching of parking pads.

The three administrative sites (Clackamas Lake Compound, Camp Cody, and Spring Drive) would not be available to the public as developed recreation sites. Little John Snopark would continue to be available to the public in the summer as a dispersed recreation site with no fee.

Based on recommendations in the Recreation Facility Analysis, outlined in Section 1.3 of this analysis, some of these sites could ultimately be decommissioned.

2.1.2 Alternative B: Proposed Action

Alternative B is the Proposed Action, as described in Chapter 1. In this alternative, a term special use permit(s) would be issued to a concessionaire(s) for operation and maintenance of the developed recreation sites listed in Table 1.1. The term for a concession permit is customarily five years with the option to non-competitively renew for five additional years if the permit holder has sustained satisfactory performance.

2.2 Project Design Criteria and Best Management Practices for all alternatives

1a Northern Spotted Owl: There are no known or predicted activity centers within or adjacent to the developed recreation sites included in this EA. If owl activity occurred in the future, hazard tree falling and other potentially disruptive activities would be halted. If necessary, a section of the campground or campsite would be closed until the hazard could be removed without disrupting an owl activity center. The temporary closure would occur between March 1 to July 15th during the critical nesting period. The restriction distance is 35 yards for heavy equipment and 65 yards for chainsaws. The distance and timing may be modified by the unit wildlife biologist according to site-specific information.

These practices are part of each alternative. The effects and benefits of these practices are included in the analyses of effects in Chapter 3. In some cases, they are standard practices that are used in all similar projects and in other cases they are specifically tailored to this project based on site-specific factors such as the underlying land allocation and associated standards and guidelines.

2a Weed Free Feed: The Forest Service mandated that all equestrians use weed free feed. Signs are posted at all Forest entrances. Additional signing will be posted and maintained by hosts at the equestrian campgrounds considered in this EA.

3a. Heritage Resources: Ground disturbing activities would be limited to routine repair and maintenance of recreation sites and facilities such as replacement of fire rings, barrier posts, picnic tables, bulletin boards and patching of parking pads. In the event that evidence is found of any evidence of heritage resource site(s), the concessionaire or Forest staff will halt any use or activity, protect the site and notify the Forest Archaeologist. Protection measures would be developed in consultation with the Oregon State Historic Preservation Officer (SHPO), appropriate Tribes, and, if necessary, the Advisory Council on Historic Preservation.

3b. The Forest Archaeologist would review and approve the annual Operating Plan for any cleaning, maintenance or minor repairs of historic structures including washing, painting, or staining. Any major repairs or replacement of historic structure components would undergo separate NEPA analysis and be evaluated and approved by the Forest Archaeologist in consultation with the Oregon State Historic Preservation Officer (SHPO) and if necessary, the Advisory Council on Historic Preservation.

4. Hazard Trees: Hazard trees adjacent to campsites and campground facilities are felled for safety. If they are in riparian areas, two programmatic aquatic restoration biological opinions discuss their disposition. Outside of riparian areas, where downed wood is scarce, hazard trees would be saved and scattered on the disturbed areas to help block vehicle access and provide wildlife habitat.

5. Permit: The concessionaire shall comply with terms of the special use permit to protect the environment while ensuring public safety.

2.3. Other Alternatives Considered

Some commenters wanted the Forest to consider issuing a special use permit to a “non-profit” and not a “for-profit” entity to operate and maintain Bagby Hot Springs. Still others wanted the Forest to break Bagby Hot Springs off as a “stand alone” special use permit offering.

2.3.1 Manage Bagby Hot Springs with a Special Use Permit to a Non-profit:

A concession special use permit is the authorizing instrument that allows a government-owned facility where a fee is charged for public use to be managed by another party with responsibilities for operations and maintenance. Federal policy requires that concessionaire permits go through a competitive bidding process before they are issued if it is known that there is competitive interest in the permit. That opportunity is generally a publicly-offered prospectus. The Forest Service cannot legally limit those opportunities to non-profit entities. Similarly, the Forest Service could not limit those opportunities to for-profit entities. The Forest Service has a Concessionaire Desk Guide and Prospectus template that it is required to use when issuing a prospectus. Requirements for the potential bidders to a prospectus include a business plan, financial operating capital, successful experience managing developed recreation sites, insurance, and an operating plan that complies with the terms and conditions in the prospectus and proposed special use permit. Once the Forest determines bidders are qualified, there are evaluation criteria to rank the bids. The process is competitive. The Forest Service is looking for a concessionaire that can best provide a safe, clean, functional, enjoyable recreational experience at the least cost to forest users. Any non-profit or for-profit entity could apply to a prospectus. The Forest Service considered the input to limit operation of Bagby to a non-profit, but did not develop the alternative because it is not consistent with policy as described above.

2.3.2 Offer Bagby Hot Springs Under a Separate Stand Alone Prospectus:

National Forest Service direction in the Concessionaire Desk Guide and other documents require Forests to bundle developed recreation sites to make them economically viable. Presumably, if multiple bids are received, a package is economically viable. Bundling multiple sites into a single concessionaire special use permit is done because there are economies of scale for both the permittee and the Forest Service. Concessionaires must hire hosts and staff, buy vehicles, pay for garbage and utilities, and perform all the operations and maintenance duties outlined in the prospectus. The unit costs for each developed site are reduced for these activities when they can be spread out among more sites. The Forest Service must issue a permit, maintain paperwork, issue billings, check insurance policies, monitor operations, meet with permittees, resolve issues, and administer the permit. Meeting with multiple permittees requires more time and permit administration and therefore increases Forest permit management costs.

There are numerous examples of concessionaires managing hot springs as part of a forest concessionaire permit. Those wanting Bagby to be issued under a separate special use

permit perhaps believe that it would allow a smaller non-profit entity to successfully bid on the prospectus. The smaller non-profits are able to bid, but may not be able to take on all the other sites included in a larger prospectus. The problem with this scenario is that a small non-profit may not meet, let alone out compete larger more experienced concessionaires, on the qualifications outlined in the prospectus (business plan, operating capital, experience, etc.). As mentioned above, the Forest cannot limit experienced for-profit concessionaires from bidding along with small non-profits. Under the terms of a concessionaire special use permit, a permittee cannot legally use volunteers to operate and maintain facilities under the terms of their special use permit. In fact they have the same wage requirements as a for-profit entity would have. A non-profit bidder would likely have higher per unit costs for managing one site like Bagby than a larger concessionaire bidder who is bidding on numerous other sites in the area. That could result in higher user fees at Bagby to cover those increased costs. Lower per unit costs would favor the successful bidder of the forest-wide complex. If the Forest separated out Bagby, it could have the added cost of issuing and administering an additional special use permit. It is possible that the most economical bidder on a separate Bagby prospectus would be the concessionaire operating all the adjacent recreation sites. In that case, the Forest would have two separate permits to administer for the same concessionaire. For the reasons above, the Forest considered offering Bagby under a separate special use permit, but chose to include it with the other forest-wide complex of developed recreation sites as part of Alternative B.

CHAPTER 3 – ENVIRONMENTAL CONSEQUENCES

3.1 Recreation

The recreation section gives additional information about the existing recreation management and discloses the effects of implementing the No Action and Proposed Action alternatives.

Existing Situation

All of the sites included in this action, except Clackamas Lake Compound, Camp Cody, Spring Drive and Little John, have been operated and maintained as developed recreation sites by Forest Service staff and volunteers. Table 3.1 displays the current fee type and amount for the sites in the proposed action.

Except for Big Eddy Day-Use Area and Bagby Camping Area (aka No Horn), all of the recreation sites currently have a user fee under the authority of the Federal Lands Recreation Enhancement Act (REA). Mt. Hood National Forest retains 95% of recreation fees collected at these sites. Revenue is used for operation and maintenance costs including the salary for seasonal employees who service the facilities and collect fees. Because these recreation sites do not have potable water, it is difficult to recruit and keep volunteer campground hosts to help manage the sites.

Bagby Camping Area (aka No Horn) has been managed for many years as a dispersed camping site with no overnight camping fee. There are few developments, however the camping area is adjacent to the Bagby Hot Springs trailhead which has a vault toilet. Campers routinely use the toilet facility. Parking in the camping area or at the Bagby Trailhead for the purpose of using Bagby Hot Springs requires payment of the standard amenity fee or displaying of a Northwest Forest Pass (\$5/day or \$30/year).

Bagby Hot Springs is currently managed by Forest Service staff. The Northwest Forest Conservancy, a non-profit organization whose mission is dedicated to the protection, restoration, education, and responsible management of the forest, is restoring the historic cabin at the hot springs site, picks up garbage and does periodic trail work in the area. There is also a dormitory-type cabin at the hot springs that is used as an administrative facility. It is not available to the public as a lodging rental.

The three administrative sites included in the proposed action are ordinarily not available to the recreating public except for events under special use authorization. Consequently,

This chapter summarizes the physical, biological, social, and economic environments of the affected project area (the baseline or existing condition) and the expected effects or changes to those environments, if either of the alternatives were to be implemented. This chapter provides a summary of the scientific and analytical basis for comparing the alternatives. More detailed analysis is in the project file.

The chapter is arranged by resource, with the affected environment or existing condition discussion presented first, followed by the estimated project effects (direct and indirect), and then estimated cumulative effects. Because nothing other than minor ground disturbing activities (replacing barrier posts, picnic tables, installing fire rings, etc.) are proposed in the scope of this document, and the fact that these activities are in an existing disturbed recreation site, these effects are limited.

they do not have a recreation fee under REA.

Little John Snopark has a use fee imposed by and payable to the State of Oregon from November 1 to April 30. For the 2010-2011 winter season, the vehicle fee is \$4.00 for a one-day pass, \$9.00 for a three-day pass and \$25.00 for an annual pass. Pass vendors may also charge an administrative fee. During the summer months, there is no use fee charged by the Forest Service..

Table 3.1. Existing Recreation Fee Type and Amount under Recreation Enhancement Act Authority at Mt. Hood National Forest Developed Recreation Sites in Proposed Action

<i>Name of Site</i>	<i>Existing Use</i>	<i>Fee Type Under REA</i>	<i>Current Fee</i>
Badger Lake	Campground	Expanded Amenity	\$10/night
Bagby (aka No Horn)	Dispersed Camp	N. A.	No Camping Fee*
Bagby	Hot Springs	Standard Amenity	\$5/day*
Barlow Creek	Campground	Expanded Amenity	\$10/night
Barlow Crossing	Campground	Expanded Amenity	\$10/night
Big Eddy	Day-Use Rec	N.A.	No Fee
Black Lake	Campground	Expanded Amenity	\$10/night
Bonney Crossing	Campground	Expanded Amenity	\$10/night
Bonney Meadows	Campground	Expanded Amenity	\$10/night
Camp Cody	Admin Site	N.A.	No Fee
Clackamas Lake Guard Stn.	Cabin Rental	Expanded Amenity	\$140 - \$160/night
Clackamas Lake Compound	Admin Site	N.A.	No Fee
Clear Creek Crossing	Campground	Expanded Amenity	\$10/night
Cloud Cap Saddle	Campground	Expanded Amenity	\$10/night
Eightmile	Campground	Expanded Amenity	\$10/night
Forest Creek	Campground	Expanded Amenity	\$10/night
Keeps Mill	Campground	Expanded Amenity	\$10/night
Knebal Springs	Campground	Expanded Amenity	\$10/night
Little Badger	Campground	Expanded Amenity	\$10/night
Little John**	State Snopark**	N.A.**	No Summer Fee**
Lower Eightmile Crossing	Campground	Expanded Amenity	\$10/night
McCubbins Gulch	Campground	Expanded Amenity	\$10/night
Pebble Ford	Campground	Expanded Amenity	\$10/night
Rainy Lake	Campground	Expanded Amenity	\$10/night
Spring Drive	Admin Site	N.A.	No Fee
Tilly Jane	Campground	Expanded Amenity	\$10/night
Wahtum Lake	Campground	Expanded Amenity	\$10/night
White River Station	Campground	Expanded Amenity	\$10/night

* Parking in the Bagby camping area (aka No Horn) for the purpose of using Bagby Hot Springs requires payment of the standard amenity fee or display of a Northwest Forest Pass.

** Little John Snopark has a use fee imposed by and payable to the State of Oregon from November 1 to April 30.

Table 3.2. Annual Operation & Maintenance Cost, Deferred Maintenance Cost, Average Annual Revenue, and Average Percent Occupancy at Mt. Hood National Forest Developed Recreation Sites in Proposed Action. Annual O&M and Deferred Mtc. Costs are from Forest Service Infrastructure Database (2007 data); Average Annual Revenue and Average % Occupancy is actual 2007 data.

<i>Name of Site</i>	<i>Existing Use</i>	<i>Annual Ops & Maintenance</i>	<i>Deferred Maintenance</i>	<i>Avg. Ann. Revenue</i>	<i>Avg. % Occ.</i>
Badger Lake	Campground	\$1,310	\$8,278	\$1,416	24%
Bagby (aka No Horn)	Dispersed Camp	No Data	No Data	\$0	N.A.
Bagby	Hot Springs	\$31,327	\$85,500	\$12,000	N.A.
Barlow Creek	Campground	\$6,498	\$250	\$485	16%
Barlow Crossing	Campground	\$6,455	\$2,390	\$650	11%
Big Eddy	Day-Use Rec	\$1,666	\$0	\$0	N.A.
Black Lake	Campground	\$5,925	\$0	\$40	1%
Bonney Crossing	Campground	\$3,306	\$2,680	\$1,221	10%
Bonney Meadows	Campground	\$1,310	\$3,150	\$425	5%
Camp Cody	Admin Site	No Data	No Data	\$0	N.A.
Clackamas Lake Guard Stn.	Cabin Rental	\$7,638	\$12,840	\$11,960	93%
Clackamas Lake Compound	Admin Site	No Data*	No Data*	\$0	N.A.
Clear Creek Crossing	Campground	\$1,606	\$0	\$1,134	11%
Cloud Cap Saddle	Campground	\$2,361	\$50	\$1,203	26%
Eightmile	Campground	\$3,739	\$0	\$4,812	15%
Forest Creek	Campground	\$1,468	\$1,825	\$739	6%
Keeps Mill	Campground	\$1,453	\$2,102	\$820	11%
Knebal Springs	Campground	\$3,930	\$13,955	\$1,043	9%
Little Badger	Campground	\$1,197	\$3,178	\$150	3%
Little John	State Snopark	\$2,743	\$10,225	\$0	N.A.
Lower Eightmile Crossing	Campground	\$959	\$3,560	\$555	12%
McCubbins Gulch	Campground	\$3,340	\$35,320	\$6,250	19%
Pebble Ford	Campground	\$1,160	\$4,182	\$1,080	14%
Rainy Lake	Campground	\$5,501	\$21,145	\$390	6%
Spring Drive	Admin Site	No Data	No Data	\$0	N.A.
Tilly Jane	Campground	\$6,807	No Data**	\$380	2%
Wahtum Lake	Campground	\$4,020	\$0	\$1,086	14%
White River Station	Campground	\$1,467	\$0	\$2,095	27%
TOTALS		\$107,186	\$210,630	\$29,974	

* Clackamas Lake Compound O&M and Deferred Mtc. costs in INFRA database include costs for many large structures which are not in the proposed action; so the data is unreliable for this analysis.

** Tilly Jane Deferred Mtc. Cost in INFRA includes A-Frame cabin which is not in the proposed action.

Clackamas Lake Guard Station is currently available as a lodging rental through the National Recreation Reservation Service (NRRS). A Forest Service volunteer host on site helps operate and maintain the cabin during the summer months when it is available to the public.

Table 3.2 summarizes management costs and average revenue at the sites included in the proposed action. The \$10/night camping fee was established at these sites in 2005 following the enactment of REA. Prior to 2005, the campgrounds were part of the Fee Demonstration program; camping fees were \$5/night, and Northwest Forest Passes were accepted in lieu of fees. The current fees at Clackamas Lake Guard Station were set in 2009 after review by the Pacific Northwest Recreation Resource Advisory Committee. Bagby Hot Springs has been a Northwest Forest Pass site since the inception of the program.

The operation and maintenance costs shown in the Table 3.2 are Forest Service estimated costs to manage the sites to agency standards. The standards for cleaning recreation sites can be found at:

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5228427.pdf

Collectively, the sites in the proposed action generate insufficient revenue to cover operation and maintenance costs (Table 3.2). Only five sites (Badger Lake Campground, Clackamas Lake Guard Station, Eightmile Campground, McCubbins Gulch Campground, White River Station Campground) individually generate sufficient revenue to cover O&M costs; however of these five sites, only three (Clackamas Lake Guard Station, Eightmile Campground, and White River Station Campground) generate enough annual revenue to also retire deferred revenue in a reasonable period of time (less than 5 years). Because operating most of these sites with volunteer hosts has not proven to be a successful sustainable practice, many of the facilities are perpetually operated and maintained at a service level that does not meet agency standards. Periodically, the Forest Service is able to retire some deferred maintenance tasks at these sites with appropriated funds (special capital improvement funds, or regular appropriations).

Effects of the Alternatives to Recreation

Alternative A – No Action: The Forest Service would continue to manage all of the sites with agency staff. Volunteers would be expected to continue their assistance with operations and maintenance at Clackamas Lake Guard Station. Volunteers would periodically assist with maintenance at Bagby (Northwest Forest Conservancy), Knebal Springs Campground (Oregon Equestrian Trails and Backcountry Horsemen) and at McCubbins Gulch Campground (Mt. Scott Motorcycle Club). Some maintenance work would continue to be contracted. The visibility to the public of Forest Service management of these parts of the forest would remain at present levels.

Financially, this portfolio of sites would continue to generate insufficient revenue from user fees to cover operation and maintenance costs. Only five sites (Badger Lake Campground, Clackamas Lake Guard Station, Eightmile Campground, McCubbins Gulch

Campground, White River Station Campground) individually would generate sufficient revenue from user fees to cover operation and maintenance costs (Table 3.2). The remaining sites would not be operated to agency standards. Only three sites (Clackamas Lake Guard Station, Eightmile Campground, and White River Station Campground) would generate enough annual revenue to also retire deferred revenue in a reasonable period of time (less than 5 years). Deferred maintenance at the remaining sites would continue to increase. Without a substantial user fee increase and/or a change in operator (partner agreement, volunteer group) in the near future, some sites may be decommissioned. Based on the recent Mt. Hood National Forest Recreation Facility Analysis, the sites most likely to be decommissioned would be Barlow Creek, Barlow Crossing, Bonney Crossing, Bonney Meadows, Clear Creek Crossing and Cloud Cap Saddle Campgrounds.

Although Bagby Hot Springs does not generate sufficient revenue by itself to defray operation and maintenance costs, decommissioning the site is not a practical option. There is keen interest from some users, such as Northwest Forest Conservancy, to assist with certain aspects of management. Some behavioral conflicts (disorderly conduct, vandalism of facilities, alcohol abuse) and law enforcement issues (hazardous use of firearms; and theft of personal property, especially at the trailhead) would continue to occur.

Camp Cody, the small cabins and other buildings at Clackamas Lake Compound, and the trailer pads at Spring Drive would not be managed as Recreation Facilities. Without a change in operator (partner agreement, volunteer group) in the near future, these facilities may be decommissioned. Little John and Bagby Campground (aka No Horn) would continue to be available to the public during the summer as dispersed recreation sites without management services.

Alternative B – Proposed Action: All operations and tenant maintenance at the sites would be done by a concession operator(s). The concessionaire(s) would also complete much of the landlord maintenance, although Forest Service volunteers and contracts would also accomplish some heavy maintenance or facility reconstruction. In general, the Forest Service would be less present in the sites. On-site managers would wear the uniform and drive vehicles marked with the trademark of the concession entity. Although management policies would not change, the visibility to the public, of Forest Service management of these parts of the forest would diminish. Based on anecdotal evidence, this change would diminish the recreation experience for some users.

Management presence would be different from the No Action alternative, and it would vary from site to site. It is likely that a concessionaire would employ a small number of hosts to operate all of the small campgrounds on the eastside of the forest. Conditions in these sites would tend toward agency standards (sites would be cleaned and stocked more frequently, and fee collection would be more consistent) but would continue to reflect reduced service levels. The cost of operating and maintaining the campgrounds would likely exceed revenue generated, but the revenue from other fee sites in the permit (campgrounds that have previously been under concession management, not included in this analysis) could cover the deficit. A modest amount of funding (probably less than

\$5,000 annually) could be dedicated toward retiring deferred maintenance each year through Granger-Thye fee offset work done by the concessionaire. It is not expected that any of the sites would be decommissioned during the planning period.

During 2009 and 2010, Black Lake, Rainy Lake, and Wahtum Lake Campgrounds were managed by a concessionaire under temporary special use permit. Without an increase in camping fees, revenue generated at the campgrounds during those two years exceeded the amount collected by Forest Service fee collectors in prior years. The revenue difference has been attributed to greater management presence coupled with fee compliance checking, and not to higher campground occupancy. Based on professional judgement, it is expected that revenue generated at most of the campgrounds in this proposed action, even without a camping fee increase, would increase under concession management.

Management presence at Bagby Hot Springs would likely be greater than in the No Action alternative. This presence would be expected to have the following influences: fewer car break-ins at the trailhead, greater fee compliance, less litter at the springs, trailhead and campground, less overall lawlessness at the tub sites, more and quicker repairs to tubs and water supply and drains, and more consistent servicing of toilets.

Camp Cody, the small cabins and other buildings at Clackamas Lake Compound, and the trailer pads at Spring Drive would be added to the Recreation Facility master plan. Granger-Thye fee offset could be used to perform landlord maintenance and retire deferred maintenance. The recreation opportunities that would be provided by these sites would fill a niche not amply provided at present by Mt. Hood National Forest. Likewise, offering Little John as a managed group camp during the summer months would broaden the Forest's developed recreation portfolio and make wiser use of a built facility.

For campgrounds operated under concession for the past decade, the concessionaire requested camping fee increases of \$1.00/site/night at roughly two year intervals. Except for the last fee increase request, which coincided with the bottom of the most recent world-wide economic recession, the Mt. Hood National Forest has approved the requests. These increases averaged three percent per year. It is expected that fees at the campgrounds in the proposed action would increase an average of three percent per year under concession management.

3.2 Heritage Resources

The National Historic Preservation Act and the National Environmental Protection Act both require consideration be given to the potential effect of federal undertakings on historic resources, (including historic and prehistoric cultural resource sites). The guidelines for assessing effects and for consultation are provided in 36 CFR 800. To implement these guidelines, in 2004, Region 6 of the USDA Forest Service entered a Programmatic Agreement (PA) with the Oregon State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (ACHP).

In accordance with the 2004 Programmatic Agreement (PA), the issuance of special use

permits to a concessionaire to operate and maintain 28 developed recreation sites on the Forest would fall under the category of undertakings with no potential to cause effects (Stipulation III.c.13: Issuance of special-use permits, easements, and other agreements where no surface disturbance is authorized and where no properties greater than 50 years old are involved.). These types of activities are excluded from case-by-case review, and require no further archaeological obligations because only very minor ground disturbing activities are proposed (replacing barrier posts, installing and replacing fire rings in campsites). Any other ground disturbing activities would undergo NEPA analysis as the projects arise.

For the developed recreation sites where historic structures may be involved, the issuance of these permits would also fall under the category of undertakings with no potential to cause effects (Stipulation III.c.14: Renewals, assignments and conversions of existing special-use permits, easements and other agreements where existing stipulations in the permit are sufficient to protect any historic properties that may be involved."), also as defined within the 2004 PA. As outlined in the Design Criteria, the Annual Operating Plan outlining any routine cleaning and maintenance of historic structures would be reviewed and approved with the Forest Archaeologist.

3.3 Environmental Justice – Civil Rights

Executive Order 12898 directs agencies to identify and address disproportionately high and adverse human health or environmental effects of projects on certain populations. This includes Asian Americans, African Americans, Hispanics, American Indians, low-income populations and subsistence uses. The Civil Rights Act of 1964 prohibits discrimination in program delivery and employment. There are communities with minorities and low-income populations that may be affected by the project. The towns of Estacada, Dufur, Sandy, the Villages of Mt. Hood, Government Camp, Pine Grove, Hood River, Parkdale, and Maupin are the nearest communities around the sites proposed in this Environmental Assessment. Even farther away, but potentially affected, are the American Indian communities of Warm Springs and Grande Ronde. There are no known areas of religious significance. There are areas of huckleberry habitat surrounding some of the developed recreation sites. There are no known special places for minority or low-income communities among the developed recreation sites included in this analysis.

Camping and visiting developed recreation sites considered in this analysis are potential destinations for minorities or people with lower-incomes. All the developed sites currently have a range of user fees. Both the No Action and Proposed Action alternatives would continue to charge fees in order to cover the cost of providing services at these sites. The fees would mirror site fees at surrounding developed recreation sites on federal and state facilities with similar services. Dispersed camping is authorized anywhere on the Forest where it is not posted. Dispersed camping can offer a no fee alternative for those unable to afford campground fees. In many cases, the dispersed campsites have rock fire rings, log benches around the fire ring and are along streams, creeks and lakes. No adverse civil rights impacts were identified. There would be no meaningful or

measurable direct, indirect or cumulative effects to environmental justice or civil rights.

3.4 Botany

No known proposed, endangered, threatened, and sensitive vascular plant, bryophyte, lichen and fungi (PETS) species are present within the developed recreation sites. Campsites and other developed recreation sites are generally unsuitable habitat for PETS botanical species. Because the developed recreation sites are already disturbed areas, no change in management activities in the sites are proposed, and nothing other than minor ground disturbing activities would take place, general botany field reconnaissance was deemed unnecessary and not conducted.

Management Of Competing And Unwanted Vegetation – Invasive Plants:

The Record of Decision and Mediated Agreement (MA) for the "Managing Competing and Unwanted Vegetation" Final Environmental Impact Statement (FEIS) apply to invasive plants (sometimes called noxious weeds), unwanted native vegetation, brush control and fuel treatments. Invasive plant management is now covered by the 2005 Record of Decision for Preventing and Managing Invasive Plants (USDA Forest Service 2005) that amended the Forest Plan.

Invasive plants are species not native to a particular ecosystem that may cause economic or environmental harm. They are sometimes informally referred to as “weeds” and are listed in Appendix B of the Preventing and Managing Invasive Plants Final Environmental Impact Statement, 2005.

The *FEIS Site-Specific Invasive Plant Treatments for the Mt. Hood National Forest and Columbia River Gorge National Scenic Area* (USDA Forest Service 2008) is a guide to invasive plant treatments for the entire Forest, including developed recreation sites being considered in this analysis. The FEIS is available at the following website: <http://www.fs.fed.us/r6/invasiveplant-eis/site-specific/MTH/>.

Because of the amount of bare ground, the concentration of motor vehicles, camping equipment, and people, a campground has the potential to be a vector area for invasive plants. For example, Lazy Bend Campground along the Clackamas River off of Highway 224 is infested with herb Robert (*Geranium robertianum*). The plant now occupies much of the roadside in the campground. There may be other campgrounds that have invasive plant infestations. Volunteer groups have been used to handpull herb Robert at Lazy Bend Campground in summer, 2010, but as with most invasive plant species annual retreatment is needed. The Forest entered into a Challenge Cost Share Agreement with the Clackamas River Basin Council (CRBC) to survey for invasive plants at USFS campgrounds along the Clackamas River starting in summer, 2010. The Forest intends to work with staff and partners to survey the other campgrounds on the Forest to determine the extent of invasives in developed campgrounds. Treatment options could then be developed and prioritized.

There would be no change in developed recreation site management activities and

nothing but minor ground disturbing activities in either alternative. Therefore, neither alternative would increase the risk of transport of weeds via equipment or the release of growing space for weeds to colonize.

3.5 Wildlife

A review of the project indicates that there is suitable habitat for several of the species that are analyzed.

Northern Spotted Owls

There are spotted owl within 1.2 miles of the campgrounds but there will be no ground disturbing activity or any change in the ambient noise levels by this action so the effect determination is No Effect.

Red Tree Voles

Red Tree Voles may be present near the campgrounds but there will be no ground disturbing activities associated with this action, so there are no effects to Red tree voles.

Survey and Manage Terrestrial Mollusk and Great Gray Owls

No habitat disturbing activities that would affect any great gray owls or mollusk species occupancy of the site will take place as a result of this activity.

All Other Species Including MIS, Land Birds, Sensitive Species, and Special Status Species

Since there are no habitat disturbing activities associated with this action there are no effects to any of these species although there may be some present near campgrounds.

Forest Plan Standards and Guidelines:

Mt. Hood Forest Plan References

Forestwide Wildlife Standards and Guidelines – FW-170 to 186, page Four-69

The action alternatives are consistent with the following standards and guidelines

FW-176	Biological Evaluations have been prepared.
FW-186	None of the alternatives would occur within ¼ mile of an active peregrine falcon nest between April 1 and July 31 st .

Deer and Elk Habitat (Management Indicator Species):

Deer and elk habitat is present throughout the Forest, adjacent to all the recreation developed sites considered in this analysis. None of the alternatives considered in this

analysis would have anything but minor ground disturbance and there would be no change in use patterns or disturbance at the developed sites. Therefore, there would be no effect to deer and elk habitat in either alternative.

3.6 Fish and Water Quality

Introduction:

Forest management activities that may alter the aquatic habitat or affect individuals or populations of PETS (Proposed, Endangered, Threatened, and Regional Forester's Special Status) fish and aquatic species require a Biological Evaluation to be completed (FSM 2671.44 and FSM 2670.32) as part of the National Environmental Policy Act process and Endangered Species Act to determine their potential effects on Regional Forester's Special Status , threatened or endangered species and designated critical habitat. The Biological Evaluation process (FSM 2672.43) is intended to conduct and document analyses necessary to ensure proposed management actions will not likely jeopardize the continued existence or cause adverse modification of habitat for species listed or proposed to be listed as endangered (E) or threatened (T) by the USDI-Fish and Wildlife Service or USDC-NOAA Fisheries, and their listed or proposed listed critical habitat.

The Biological Evaluation process (FSM 2672.41) is also intended to conduct and document analyses to ensure that Forest Service actions do not contribute to loss of viability of any native or desired non-native plant or contribute to animal species or trends toward Federal listing of any species for species listed as Regional Forester's Special Status (S) by USDA-Forest Service Region 6.

The Biological Evaluation (BE) addresses the effects of a concessionaire operation and maintenance of Forest campgrounds, on PETS aquatic species suspected or known to reside in the Sandy River, Hood River, White River, Fifteenmile Basin, and Clackamas River fourth field Watersheds located on the Forest. There are six federally threatened salmonid species present within those Watersheds: Lower Columbia River (LCR) Chinook, LCR steelhead, MCR Steelhead, Upper Willamette Chinook, Columbia River Bull Trout, and LCR coho. Additionally, redband trout (Forest Service Regional Forester's Special Status Species) occur within the White River, Fifteenmile, and Hood River Watersheds, and are suspected within the Upper Sandy River Watershed. Four aquatic invertebrate species on the Forest Service Regional Forester's Special Status Species list, Columbia dusky snail (*Colligyrus sp. nov. 1*), Barren Juga (*Juga hemphilli hemphilli*), Purple-lipped Juga (*Juga hemphilli maupinenis*), and Scott's Apatanian Caddisfly (*Allomvia scotti*) may also occur on the Zigzag Ranger District (Table 3.2).

Nothing but minor ground disturbing activities are planned under the alternatives (replacing a barrier post, installing a fire ring in a campsite, etc.). Other ground disturbing activities would be done under separate NEPA with additional BE analysis and documentation. Due to the administrative nature of this project, no pre-field/field review was necessary to complete the PETS fisheries BE.

Effects by Alternatives

Alternative #1: No Action Alternative Determination:

The Forest Service will continue to manage the campgrounds and developed sites listed in Table 1.1. There will be “No Effect” on TES species and “No Impact” on Forest Service Regional Forester’s Special Status Species.

Proposed Action Alternative Determination:

Determinations for the Proposed Action were made as a result of analysis at fifth field scales. The checklist for *Documenting Environmental Baseline and Effects of Proposed Action(s) on Relevant Indicators* was consulted for this project. There would be no measurable change from baseline conditions resulting from issuance of this special use permit and no adverse effect on aquatic habitat or listed species. The rationale for this is based on the administrative nature of this special use permit and the lack of on the ground activities associated with its issuance.

Project Effects

Due to the administrative nature of this project, no direct or indirect effects were identified for this special use permit issuance. There will be “No Effect” on TES species and “No Impact” on Forest Service Regional Forester’s Special Status Species.

Cumulative Effects Determination:

Due to the administrative nature of this special use permit, no cumulative effects were identified.

ESA Cumulative Effects

ESA cumulative effects are those effects of future State or private activities, not involving Federal activities, which are reasonably certain to occur within the action area of the Federal action subject to consultation [50CFR section 402.02]. Due to the administrative nature of this special use permit, no cumulative effects were identified

NEPA Cumulative Effects

Due to the administrative nature of this special use permit, there is no overlap in space and time and there are no NEPA cumulative effects identified.

Interrelated or Interdependent Actions:

Secondary impacts include interrelated projects that have no independent utility apart from the proposed action, and interdependent projects that are a part of a larger action and depend on the larger action for justification. There are no interrelated or interdependent actions for the proposed action.

Consistency with Aquatic Conservation Strategy (ACS) of the Northwest Forest Plan and Essential Fish Habitat: The proposed action meets the attainment of ACS Objectives in the long term at the landscape level by maintaining all of the features addressed by the ACS

Determination of Effect Essential Fish Habitat:

Public law 104-267, the Sustainable Fisheries Act of 1996, amended the Magnuson-Stevens Fishery Conservation and Management Act (MSA) to establish new requirement for Essential Fish Habitat (EFH) descriptions in Federal fishery management plans and to require Federal agencies to consult with NMFS on activities that may adversely affect EFH. "Essential Fish Habitat" means those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity (Magnuson-Stevens Act). The Pacific Fisheries Management Council (PFMC) has recommended an EFH designation for the Pacific salmon fishery that would include those waters and substrate necessary to ensure the production needed to support a long-term sustainable fishery (i.e. properly functioning habitat conditions necessary for the long-term survival of the species through the full range of environmental variation).

Salmon fishery EFH includes all those streams, lakes, ponds, wetlands, and other water bodies currently, or historically accessible to coho and Chinook salmon in Washington, Oregon, Idaho, and California, except above the impassable barriers identified by PFMC (PFMC 1999). Salmon EFH excludes areas upstream of longstanding naturally impassable barriers (i.e. natural waterfalls in existence for several hundred years). Three salmonids species are identified under the MSA, Chinook salmon, coho salmon and Puget Sound pink salmon.

Due to the administrative nature of the actions considered in the alteratnives, both the No Action and the Proposed Action to issue concessionaire permits will have No Adverse Affect on Essential Fish Habitat for Chinook and coho salmon under the 1996 Amendment to the Magnuson-Stevens Fishery Conservation and Management Act (MSA).

The Clean Water Act and Best Management Practices:

Sections 208 and 319 of the Clean Water Act of 1972, as amended (1977 and 1987), acknowledge land treatment measures as being an effective means of controlling nonpoint sources of water pollution and emphasizes their development. These land treatment measures are known as Best Management Practices (BMPs). BMPs are used to control or prevent nonpoint sources of pollution from resource management activities, and to ensure compliance with the Forest Plan, as amended, the Clean Water Act, as amended, the Oregon Administrative Rules (OAR Chapter 340-41-0004,0028, and 0036), Department of Environmental Quality (DEQ), and the Memorandum of Understanding between the Oregon DEQ and the USDA, Forest Service. General BMPs are described in the document General Best Management Practices, USDA Forest Service, Pacific Northwest Region (11/88). The BMPs are flexible in that they are tailored to account for diverse combinations of physical and biological environmental circumstances. The Forest has documented typical BMPs and assessed their effectiveness (USDA Forest Service 2004a).

Other Standards and Guidelines - FW-054 to FW-079, FW-080 to FW-136, FW-137 to FW-147, B6-001 to B6-042, B7-001 to B7-070, and A9-033 to A9-040

Both of the alternatives are consistent with these Forest Plan Standards and Guidelines.

3.7 Other (40 CFR 1502.16 and 40 CFR 1508.27)

Farm and Prime Range Land

There would be no effect upon prime farmland or prime rangeland. There are grazing allotments around some of the proposed campgrounds, however no change in general operations and management of the site are planned.

Flood Plains or Wetlands

No flood plains or wetlands are affected by the alternatives.

Laws, Plans and Policies

There are no identified conflicts between the proposed action and the objectives of Federal, Regional, State laws and local land use plans, or policies.

Productivity

The relationship between short-term uses and the maintenance of long-term productivity: no reductions in long-term productivity are expected.

Irreversible and Irretrievable Commitments

None were identified.

CHAPTER 4 - LIST OF PREPARERS

Team Member	Role
Kathryn Arndt	Fisheries Biologist
Alan Dyck	Wildlife Biologist
Mike Dryden	Acting Forest Archaeologist
David Lebo	Botanist
Michelle Lombardo	NEPA Specialist
Malcolm Hamilton	Recreation and Special Use Permit Specialist/Team Lead
Kathleen Walker	Writer
Mike Redmond	Writer/Editor
Christine Arredondo	Recreation Staff Officer Reviewer/Editor

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