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RE: Scoping Comments for 2008 Clackamas Road Decommissioning

September 3, 2008

Dear Wes,

Thank you taking the time to consider Bark's comments with regards to the 2008 Clackamas Road Decommissioning. Bark has been working with the Forest Service, as well as with the Clackamas Stewardship Partners (CSP) to envision a day when the Clackamas District is no longer burdened by the legacy of failing roads. We believe that this collaboration can and will result in a road system that is more economically sustainable and better for the aquatic life support of our forests.

For the past six months, Bark has been working with the Forest Service with the support of the CSP to develop a road surveying program that will inform proposals such as this one. The roads of Mt. Hood National Forest have been considered and analyzed for the past decade through several studies and decisionmaking guidance. However, vast amounts of data missing from the actual status of the roads has left the planning and implementation of restoration work, which has been repeatedly identified as necessary to the continuing health of the Clackamas District, nearly impossible. Our intention in working with the Forest Service was to develop a survey program that we all agreed was rigorous and complete enough, yet able to be used by volunteers of whom Bark would help to identify and organize. This has been a tenuous, yet historical collaboration.

As the Forest Service has capitalized on good weather this summer and used staff resources to begin testing the survey forms in the four subwatersheds included in this proposed action, collecting data on the roads, we have felt encouraged to see such a commitment by the agency to see this program through. We hope it will inform the other districts as forestwide road decommissioning and restoration remains a priority in the coming years. We had not anticipated a notice of proposed action until further along in the process of this survey form, so we hope that you will consider the following comments on what we expect to see in the forthcoming environmental assessment.

The 2003 Roads Analysis claims that Mt. Hood National Forest's road system should be reduced by 50%. This included all maintenance levels, however when we look at the national forest maps we see that this 50% could be made up in focusing on the webs of old logging roads no longer needed by for administrative purposes or recreation access. Maintenance level 3-5 roads are the primary focus of concern.

Although 50% is an aggressive amount of road removal, we expect the Forest Service to not be limited by this. In a recent CSP meeting, Forest Service fish biologist Dan Shively spoke about the funding reality. By his understanding, the Forest Service only had the funding to budget for maintenance on 12% of the roads in Mt. Hood National Forest. Although these numbers can be argued and made arbitrary, the sentiment remains. Mt. Hood National Forest must begin landscape-level, forestwide planning for permanent road removal in order to achieve restoration goals and a fiscally sustainable road system.

In 2007, Bark began to campaign for the mandated 2005 Travel Management Rule to become the driving impetus for this long-term road system planning. Included in the dire need for a future response to the growing off-highway vehicle use on national forests, the Travel Management Rule also mandates that a minimum road system be evaluated and mapped for future planning. The Travel Management Rule provided a recreation framework for beginning to assess the needs of recreation users and their access interests, while achieving ecosystem health by overall reducing the miles of roads in our forests. Mt. Hood National Forest has opted against this direction and chosen to pursue a piecemeal approach to the aquatic restoration needs, as it relates to the impacts from roads, for the different districts by producing separate projects. Many of these restoration proposals are attached to stewardship contracting and will undergo individual environmental assessments.

While Bark continues to engage in Travel Management Plan directives, Bark has also been cautiously engaging in this alternative direction by the Forest Service. We feel the recent commitment to a data gathering survey effort has shown thoughtful interest in achieving a long-term strategy for effective road removal. In the forthcoming environmental assessment we expect to see the data gathered reflected in order to provide the public with the information that led to the proposed action. Our concerns lie in what might still be missing by not utilizing the Travel Plan as the management planning opportunity. For instance, without a broader inclusion of the recreation community, this collaborative effort is put at risk should important stakeholders lose confidence in this important restoration effort.

We maintain hope that the 2008 Clackamas Road Decommissioning will ultimately lead to not only an action that is good for the forest, but will work as a model for successful planning throughout the forest. In short, we will be looking to include the following recommendations as a part of this extending model:

Decoupling the commercial timber sale program and these future restoration projects is essential to gaining public trust. If future logging units shown on the scoping map are included as an influencing part of the proposed action, we expect a thorough environmental assessment of these foreseeable actions. Although, much of the work will be paid for through stewardship contracting, Bark does not believe that this should limit the Forest Service to maintain roads for future logging projects.

Active decommissioning should always be prioritized over passive decommissioning wherever possible. In our own road survey efforts we have found that road closures are, on a whole, ineffective over time. We are fully aware of the prohibitive cost increase when considering the complete removal and replanting. However, the long-term cost of roads maintenance is greater and much more difficult to budget.

For any proposed action on roads with hydrologic feature, we will expect clear direction on future management included in the environmental assessments proposed action and potential impacts. In particular, if the proposed action only includes a new or reinforced closure on a road with hydrologic features, we expect to see data from the stream passage surveys and culvert status included in foreseeable use and maintenance analysis. This includes, but should not be limited to the following roads; (Berry/Cub) 4600-330, 4671, 4671-260, 4671-265, 4672, 4672-260, 4672-250, 6350, 6350-306, 6350-320, (Middle Upper Clackamas) 4670-016, 4670-217, 4671, 4671-120, 4671-160, 4671-170, 4672, 4672-210, 4672-220, 4672-140, 6350, (Last Pinhead) 4200, 4210, 4210-350 (which follows very close along Last Creek), 4220-112, 4220-114, 4660-061, 4660-390, 4680-140, 4680-146, (Upper Clackamas Headwaters) 4220, 4220-125, 4220-130, 4220-131, 4230, 4230-035.

Include the recreation community into the data collection effort. Aside from highlighting fishing and hunting, the scoping letter does not address the process by which other recreation groups (mountain biking, hiking, horseriding, etc.) will be thoroughly consulted. In particular, the Upper Clackamas Headwaters encompasses parts of the Olallie Lake recreation area.

Mapping is essential to communicating the need for and the impact from this proposal. In order to make the scoping map a more useful document to reach impacted users of the forest, we would encourage updating the conventional scoping map to represent features that are recognizable to the recreation community (campgrounds, trail access, trails, etc.)

Consider reducing the size of this proposal in order to more effectively show a completed decommissioning process for a future forestwide effort. We understand the need to complete this process in a timely manner and thus feel that the four subwatersheds may be too ambitious. Bark feels that having a successful “pilot” project will be more beneficial for future restoration and road decommissioning planning and funding.

We sincerely look forward to working with the Forest Service and continuing our involvement with the Clackamas Stewardship Partners for continuing implementation funding for this important work. Please contact me for further clarification on our comments.

Thank you,

Amy Harwood
Program Director
Bark