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RE: Scoping Comments Road Decommissioning for Habitat Restoration,
Increment #3 (Barlow and Hood River Ranger Districts)

November 17, 2010

Dear Michelle,

The following are the comments of the undersigned organizations and individuals on the scoping notice and maps for Increment 3, White River road decommissioning. We greatly appreciate the efforts of the ID Team in undertaking an ambitious and comprehensive analysis of the White River watershed's roads that has resulted in a proposal to decommission 1/3rd of its roads. In addition we are pleased to see that you have recognized and included road to trail conversion opportunities in Increment 3. Our comments begin with our specific recommendations and concerns and then move towards big picture issues.

I. Specific Recommendations

a. Relation to Bear Springs Timber Sale

As you know, Bark has been concerned about the Bear Springs timber sale since its inception. The project area, which covers over 16,000 acres in 83 far flung units is simply too large for Bark staff and volunteers to groundtruth in short public comment periods. In addition, we are deeply concerned about the cumulative impacts of this project. We hope you will consider our recommendation that you postpone the project to allow agency staff some time to field check the units and make decisions based on the new facts. Bark staff and volunteer teams noticed significant discrepancies between the conditions reported in the PA and the actual conditions on the ground in 28% of the units we visited, as noted in our comments.

In addition to our concerns about that timber sale, we are generally concerned about the fact that in two of the areas where the Forest is considering ambitious road decommissioning projects the Forest is simultaneously planning extremely large thinning treatments. It appears that thinning and road decommissioning have been coupled in both the White River and Collawash. The two activities are not necessarily mutually beneficial, and thinning seems to be taking precedence over the need to promptly utilize existing funding opportunities and remove roads from the landscape.

At the very least, we expect to see a thorough analysis of the cumulative impacts of Bear Springs thinning on this project. But truly we would like to see many of the units dropped so that MHNH can take advantage of opportunities to decommission the many miles of harmful roads in the White River Watershed.

b. OHV Use

Bark's concerns about OHVs related to this project fall into two categories. In the first category we are generally concerned that passive decommissioning will allow illegal OHV use to flourish in the White River Watershed. As you know, it is not always obvious from the main road when an OHV incursion into a closed area has occurred. By truly taking a road off the landscape and recontouring the road this costly and ecologically harmful problem can be averted.

Our second concern is specific to the roads adjacent to the McCubbins Gulch and Rock Creek OHV areas. Numerous roads adjacent to those OHV systems have been proposed for decommissioning. If those roads are not obliterated in the next year it is entirely possible that they will be utilized by OHVs. Some of the users may not even know they will be riding illegally because the OHV Plan is so new and they may be accustomed to riding on those roads. Also, if you do not obliterate roads OHV users looking for more adventure than that provided on designated routes will be tempted to utilize passively decommissioned roads and it will be extremely challenging for law enforcement officers to intervene. We urge you to take the appropriate precautions to prevent illegal OHV use.

c. Site Specific Recommendations

i. Additional Roads to Decommission

The following is a list of roads not marked for decommissioning that we hope you will consider including in the project. We are asking you to include some of these roads because they provide access that could have harmful impacts to current or proposed wilderness areas, because they do not appear to lead to any unique features or access points, because of impermissibly high road density in the area, or because we are concerned about their impacts to wildlife and aquatic resources. If you decide not to include any of these roads, please explain why they are necessary.

- 2711-140
- 2711-150
- 2710-140
- 2710-160
- 4860
 - Does not need to be a through road. Closing a portion of this road would link important core habitat between Boulder Lake and Badger Creek Wilderness
- 4811
 - Closing the upper stretches of this route would increase terrestrial habitat surrounding the Badger Creek Wilderness
- 3531
 - Closing this road beyond its intersection with the Trail #185 would allow for the removal of a duplicative system and improve terrestrial habitat in the Twin Lakes area
- 4881-121, 123
 - This road essentially runs parallel to the trail to Little Boulder Lake. These roads do not provide known significant access points. Reducing road density in the backcountry of the Mt. Hood National Recreation Area, the Bonney Butte Wilderness and the Boulder Lake area provides significant interior wildlife habitat benefits by creating larger core areas that are undisturbed by motorized traffic. We would also support converting these roads to trails.
 - On the 4881-123, our recommendation for decommissioning is only for the area beyond the access point for trail #473.

ii. Road to Trail Opportunities

First we would like to reiterate our support for MHNH using this road decommissioning proposal as an opportunity to enhance our trail system while simultaneously achieving ecosystem benefits. While we believe that road to trail conversions can generally still allow the Forest to achieve the ecosystem benefits that drive the purpose and need of this project, we also recognize there may be areas where trails could cause continued ecological

harm. Bark does not support road to trail conversions in these instances, if they ever arise.

- 2711-130
 - This road, currently proposed for decommissioning, could make for an excellent connector trail between the Badger Creek Trail #469 and #479
- 4880-014, 015
 - One of these roads, if converted to a trail, could provide a link between the #478 and #463A trails with just a small amount of new trail construction
- 4870
 - Could link to the #478 trail to extend this trail
- 43-260, 43-260-017
 - The #487 Clear Creek Trail could be significantly extended to cross the White River to allow people to travel from the Clear Creek Campground to the Barlow Crossing campground
- #490A
 - This is shown on the map as a road to trail conversion but is already a trail closed to motorized access. Will additional work be done on this trail?

II. General Recommendations

In general, our greatest concerns pertain to the actual implementation of this project. We hope to work with you to ensure the timely implementation of site specific road decommissioning work.

a. Travel Planning Generally

We recognize Mt. Hood National Forest's (MHNH's) reasoning for undertaking the critical work of identifying roads for decommissioning in an incremental process rather than through a singular forest wide process. However, we remain concerned about how the piecemeal approach to road decommissioning in Mt. Hood National Forest will fit with the minimum road system directive of the Travel Management Rule.

The Travel Management Rule mandates identification of a minimum road system in each and every national forest. Unnecessary roads should be decommissioned.

"For each national forest, national grassland, experimental forest, and any other units of the National Forest System (§212.1), the responsible official must identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands..." Roads "that are no longer needed to meet forest resource management objectives... should be decommissioned or considered for other

uses, such as for trails. Decommissioning roads involves restoring roads to a more natural state... Forest officials should give priority to decommissioning those unneeded roads that pose the greatest risk to public safety or to environmental degradation.”

36 C.F.R. 212.5(b). Mt. Hood National Forest, like many forests, has foregone undertaking this extensive analysis while it awaits national directives on the implementation of the Travel Management Rule. While the result of Mt. Hood’s incremental process will be a significant improvement over the status quo, the Travel Management Rule’s mandate to identify a minimum road system will still need to be fulfilled.

The Travel Management Rule identifies the issues that a responsible officer must consider when identifying the minimum road system.

“(a) General criteria for designation of National Forest System roads, National Forest System trails, and areas on National Forest System lands. In designating National Forest System roads, National Forest System trails, and areas on National Forest System lands for motor vehicle use, the responsible official shall consider effects on National Forest System natural and cultural resources, public safety, provision of recreational opportunities, access needs, conflicts among uses of National Forest System lands, the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration.”

36 C.F.R. 212.55. We understand that the ID Team goes through the process of identifying the issues with and uses of all the roads in the project area. Specialists are afforded the opportunity to comment on the roads, and decisions are made based on the uses and risks associated with the road. However, we remain uneasy that the incremental process is not based on the process the Travel Management Rule identifies. How do you plan to use this process to meet the minimum road system mandate? Said differently, *after the increments are complete, will the resulting road network be a system that meets the analysis requirements outlined in the Travel Management Rule?*

On November 10, 2010 U.S. Forest Service Deputy Chief Joel D. Holtrop sent out a memo on Travel Management Rule Implementation, attached below as Appendix A. The memo requires each forest in the nation to complete its travel analysis report, which will contain comprehensive minimum road system analysis adequate to fulfill the demands of subpart (A) of the Travel Management Rule, no later than the end of FY 2015. The EA should address

how this incremental process will fit in to the direction and mandates provided in this memo.

The Directive does not allow forests who have previous conducted travel analysis to ignore the mandate. Rather, it urges the appropriate line officer to assess the adequacy of the prior report and its relevance to the process of complying with subpart (A), determine the appropriate steps for new analysis, and build on previous work.

We recognize that Mt. Hood completed a Roads Analysis in 2003, but we urge you to reexamine the conclusions from that analysis and improve on it for numerous reasons. For one, much of analysis was conducted on paper without adequate data from the field. In addition, conditions have changed significantly. We have substantial new information about roads in general and information specific to Mt. Hood's roads. Both Bark's road truthing reports and the reports submitted by the Clackamas Stewardship Council have found that approximately 25% of all decommissioned roads in the Clackamas Ranger District are currently being used, mostly by OHVs. In addition, Mt. Hood had decommissioned or has plans to decommission hundreds of miles of roads. The 9th Circuit Court of Appeals recently held that discharges from logging roads must be regulated under the Clean Water Act. Bull trout have been reintroduced in the Forest and Critical Habitat designations have changed. Scientists have provided us with new models projecting how climate change will impact our region that include predictions of severe winter storms and intensified summer droughts. In sum, the travel analysis completed in 2003 might be a good resource, but it cannot be the sole basis for an up to date travel analysis.

There is much work to be done to comply with the requirements of subpart (A) and the directive. We urge you to work carefully through the six steps laid out in FSH 7709.55, Chapter 20. We look forward to seeing a prioritized list of actions to projects to implement the minimum road system as described in step 6. This is a wonderful opportunity to finally prioritize the establishment of a minimum road system and we hope Mt. Hood will make the most of it.

b. Use the 1999 Access and Travel Management (ATM) Plan to Guide the Process

The ATM is the proper starting place for decisions on roads. The plan is responsive to the Northwest Forest Plan and the Mt. Hood Land and Resource Management Plan. The ATM was intended to analyze the desired future condition of travel ways in Mt. Hood National Forest. It deliberately

identifies those roads that have a specific purpose, and suggests closures/obliteration for those that do not.

One significant inconsistency between Increment 3 and the ATM is the use of the word "decommission" instead of the ATM's "close" or "obliterate" recommendations. The ATM defines terms that we have found are used fairly loosely. The public needs greater precision in phraseology in order to be able to effectively comment on a road decommissioning proposal. Here is one example of the ATM spelling out precisely what is meant by the terms it uses for closed roads or roads available for closure or obliteration.

"Closed roads are closed to traffic, but remain on the road system. These roads have an identified future use (generally within seven years). Roads needed for future timber harvest activities or fire protection efforts would fall into this category. Roads identified for obliteration have no identified future use (generally within ten years) or are a high risk for resource damage. Need for closure or obliteration exceeds funding, so roads at highest risk for resource damage or other important resource concerns are closed or obliterated first. Roads not funded for closure or obliteration will naturally close due to lack of maintenance over time. Some of these roads may be converted to trails if identified in the Forest Trail Management plan."

ATM at 9. Literally, the ATM recommendation is that roads that will not be used in 10 years are candidates for "obliteration." If funding was available and the ATM had been implemented, Mt. Hood National Forest would have reduced its road system nearly 49% by 2009.

Bark recommends here, and similarly recommended in our comments on the Zigzag Road Decommissioning project, that the Forest Service take a close look at the ATM and incorporate some of its terms and recommendations into this and all future road decommissioning projects.

Understanding that funding for this work is available and has continued since 2008, Bark recommends that Mt. Hood National Forest reset the clock and use 2008 as the starting point for the 7-year and 10-year thresholds. While this is the equivalent of a nine-year delay in the recommendations contained in the ATM, it appears to be a reasonable course of action. It ensures that the ongoing ecological impacts and taxpayer burden of the road system will be addressed in a timely manner and will not be subject to arbitrary and seemingly indefinite delays.

c. Provide a Thorough Cost/Benefit Analysis

Decommissioning roads has a broad range of economic impacts, as does keeping roads on the system. The EA should consider key issues such as the economic impact road decommissioning will have on ecosystem services in the project area and the economic impacts of improved watershed health. These improvements should reduce the need for interventions such as invasive plant treatment.

In addition to these environmentally oriented savings, the EA should disclose some of the more socially oriented savings to MHNH's budget if these roads are decommissioned. Managing and attempting to curtail dangerous activities such as illegal OHV trail building and use, illegal dumping, manufacture of controlled substances, and car stripping on unneeded roads throughout the project area is a costly endeavor. One of the great benefits of decommissioning a portion of MHNH's vast road network should be reducing the burden on law enforcement and the total area easily accessible for illegal activities. Decommissioning unneeded roads will save MHNH money and this positive impact of the project should have been included in the analysis.

Keeping roads in the system costs quite a bit of money. Indeed, MHNH's deferred maintenance cost figures are quite high. In your EA, please make sure to include an assessment of whether you anticipate having the funds necessary to afford to maintain the system that would exist when all the road decommissioning has been completed.

Bark does not suggest that it is possible to come to an exact number when looking at the cost and benefits of this project. However, we feel strongly that spelling out, with as much specificity as reasonably possible, the costs and benefits of this project in the EA will provide the public with a much greater understanding of the project and will allow for more insightful comment from the public.

d. Information about Uses and Impacts of the Roads Must Be Accessible to the Public

As mentioned above, the Travel Management Rule requires a fairly comprehensive analysis of the various features of roads. In a series of meetings following the resolution of Bark's Zigzag road decommissioning appeal we discussed with agency staff, including several individuals who are involved with this project, the importance of providing information about the roads in the project area. This includes roads being considered for decommissioning and roads not currently being considered. Through our

negotiations Bark and agency staff agreed that the outcome of the "Transportation System Planning Tool," including the list of roads and associated narratives, will be put into the project file for all subsequent road decommissioning projects. This will include a description of road use such as recreation, administrative, vegetation management, fire lookout, etc. The existence of this document and its location will be at the very least noted in the EA and it made accessible to members of the public, including by electronic means if feasible.

Providing access to this information will greatly improve the public's ability to provide well reasoned comments on the EA.

e. Vegetation Management Plans

Plans for road decommissioning end up being closely tied to timber sale planning, despite the fact that they fall outside of the purpose and need of these plans. While it is not always possible for the Forest Service to disclose specifics of its future timber harvest and vegetation management plans, we request that you carefully analyze any and all reasonably foreseeable plans in the EA. Where decisions regarding the expected treatment for roads considered for decommissioning are informed by anticipated future vegetation management, please disclose and properly analyze environmental impacts of these treatments in the EA. This especially includes plans to keep roads in storage in anticipation of future management activities. Any activities that result from this project, including timber management plans such as pre-commercial thinning, must fall within the purpose and need of this project.

In addition, in our post-appeal resolution meetings the Forest Service agreed to include a plantation year of origin map in the project file and note its existence in the EA. This information is relevant and necessary for members of the public to provide informed comments.

f. Clarify Prescriptions

The word "decommission" is a confusing term because it can really mean one of six things in this project. It can mean the complete obliteration of a road, including the pulling back of fill, recontouring, replanting, etc. It can mean the obliteration of a road to sight distance (a couple dozen yards), the removal of some culverts, and an anticipation of future use. And it can mean something in between, where there is obliteration at several high risk areas, some replanting and reseeding, some culvert removal, etc.

Decommission here can also mean convert to a trail, and again here three options exist. A trail can be created along the old road bed with minimal treatment, a trail can be created in the area of a road that has been completely obliterated, and a trail can be created that falls somewhere in between these two options, with some recontouring and reseeded.

Simply using the term "decommission" can lead to false expectations because members of the public will not understand what types of treatment is anticipated. The EA should refrain from using this term where it can use a more specific term.

g. The Ghost Road Network

We urge you to obliterate as many roads as possible as a part of this process. Legacy Roads and Trail funding is continuing to grow and garner congressional support. MHNH has demonstrated its willingness put those funds to prompt use. Bark is committed to helping MHNH obtain funding to obliterate roads. We urge you to seize the day. We all recognize that MHNH, like many other forests, contains far too many miles of roads. We also all recognize that decommissioning roads by obliteration, and truly removing roads from the landscape, is far more costly than simply passively decommissioning roads to make them inaccessible to motorized vehicles. But it is critically important to remove as many miles of roads from the landscape as possible.

In addition to environmental impacts, we are deeply concerned about the impacts of a vast "ghost" road network that does not show up on new maps but is known to both the Forest Service and many forest users. Keeping these roads in the landscape prevents ecosystem recovery, perpetuates the legacy of negative impacts to wildlife and plant life, and creates innumerable opportunities for those seeking convenient places to carry out illegal activities such as manufacturing drugs or illegally riding OHVs where it is virtually impossible for law enforcement to apprehend them. On Tuesday Nov. 16, the Oregonian ran a front page story on the problem of illegal poaching in Oregon, noting that illegal poachers likely take more mule deer than legal hunters in Oregon. Ghost roads could provide excellent cover for illegal hunting camps.

Recognizing that taking roads off the landscape is more costly than more passive forms of decommissioning, we urge you to consider innovative solutions. Options exist for cost effective ways to expedite revegetation of old road beds with trees through volunteer crews or purchasing specialized machinery. We would be happy to assist in these endeavors in whatever ways possible.

h. Clarify Timeline/Priorities

Members of the public who look at this scoping notice and subsequent EA may believe that all of the roads will be decommissioned as soon as a decision on this project is issued. We recognize that as much as many of us hope this will be the case, it is unlikely. With the elimination of “decommission with delay” we need a new mechanism to understand when you anticipate decommissioning the various roads in the project area.

We suggest a chart that lists the roads and puts them into three categories which indicate the urgency you associate with decommissioning these roads. These categories could be decommission immediately upon receiving funding, decommission soon, and decommission after planned treatments/low priority due to other factors. This chart, which will indicate your anticipated priorities and timeline, should include notes letting EA readers know if you have planned some kind of future use of the road or any other information pertinent to your decision.

i. Commit to Working with Recreation Groups

The enthusiasm of recreationists is a crucial component to this project, as some members of the public will only discover an area they have previously used or had looked forward to visiting is no longer accessible by car after they travel to that road. Understandably people will be confused and possibly even upset when this situation occurs. We urge you to reach out to these recreationists through signage explaining the importance of this project for aquatic and wildlife health.

We also recognize that the inclusion of various recreation groups and their subsequent communications to their members can play a critical role in how this project is received. For this reason, we strongly urge you to listen carefully to the concerns and road to trail conversion proposals provided by recreationists. If and where you deny their requests, please provide them with an adequate explanation. Some people have put an extraordinary amount of thought into this project and it would be a great loss if their comments were not given the consideration they are due. Also, please be clear about how you anticipate implementing road to trail conversions, including your anticipated timeline and planned prescriptions.

We endorse the comments submitted by many of these groups and especially Trailkeepers of Oregon and urge you to work closely with this group. They have an excellent understanding of the needs and wants of

hikers, who comprise the majority of MHNFs recreationists, as well as an excellent track record of volunteerism and trail maintenance.

j. Winter Travel Planning

The scoping maps indicate that one short road segment south of Frog Lake is being considered for a road to snowmobile trail conversion. However, Mt. Hood has not yet chosen to engage in comprehensive planning for over snow vehicles (OSVs). We encourage the MHNF to take on this planning process promptly. By not undertaking this planning process, Mt. Hood National Forest:

1. will continue to allow resource damage from unanalyzed and unregulated OSV use, including negative impacts on wildlife and on vegetation in low-snow areas;
2. will fail to prevent user conflicts between OSV use and quiet, non-motorized recreational users of the forests to persist indefinitely;
3. gives OSV travel preferential treatment amongst other motorized users of the Forest who have to obey the "closed unless open" policy of the 2005 Travel Management Rule;
4. does not meet either the spirit or letter of Executive Orders 11644 and 11989; and
5. does not provide a record of the decision made not to include winter season/OSV use as suggested by the 2005 Travel Management Rule.

Resource Damage

Damage to public natural resources by over-snow vehicles has been documented in a number of national forests and public lands. This damage takes many forms, including tree and tundra damage in alpine areas, treetop damage in forest regeneration areas, stream bank damage and destruction of spawning areas used by OSV's for crossing and for play, trail and vegetation damage in staging areas during low snow years, and degraded water quality from two-stroke snowmobile emissions. This damage is often not recognized, documented and/or remediated when OSV's are exempted from travel planning. The use of OSVs is a common and persistent occurrence which can be extremely difficult to curtail.

In addition, over-snow vehicles are often given unregulated access to areas inhabited by key wildlife species such as bear, fisher, deer and elk. Harassment of wildlife has been reported in many forests. These negative impacts go unrecognized, undocumented and are allowed to persist, unless OSV's are included in the "closed unless designated open" regulatory framework, along with all other motorized users.

User Conflicts

User conflicts between over-snow vehicles and quiet recreationists are a problem in Mt. Hood National Forest. Exempting OSV's from travel planning means these user conflicts are allowed to persist indefinitely, contrary to Executive Orders 11644 and 11989 (see below). These conflicts are largely due to the disproportionate impact OSV's have on other forest users. While most quiet recreationists do not detract from OSV users experience, the reverse is certainly not the case. In certain circumstances, just one OSV can significantly detract from those seeking the quiet and solitude of skiing or snowshoeing in winter. The noise, pollution and high speeds of OSV's not only degrade other users recreational experience, they can also displace quiet recreationists. Many quiet recreationists completely avoid winter snow parks where snowmobiling is allowed

2005 Rule Inconsistent with Executive Orders

Executive Order 11644 (1972) and its amendment, Executive Order 11989 (1975), specifically included snowmobiles and emphasized "the need for a unified Federal policy toward the use of such vehicles on the public lands." These Executive Orders clearly require that all motorized vehicles, including snowmobiles, be managed. According to these Orders, affected agencies, such as the Mt Hood National Forest, must develop and issue regulations and instructions that minimize the following: resource damage to the public lands; disruption of wildlife habitats; and conflicts between off-road vehicle use (including OSV's) and other existing or proposed recreational uses.

It is clear that the intent of Executive Orders 11644 and 11989 is to protect natural resources on public lands from off-road vehicle use, and to manage and minimize conflicts with other users of public lands. The discretionary "exemption" for OSV's in the 2005 Rule (36 CFR, part 212) is not consistent with the 1972 Executive Orders and does not remove the requirement that the Forest Service comply with the Executive Orders. The Rule does not provide a blanket exemption for OSV use, but instead allows the Forests discretion to regulate their use. The 1972 Executive Orders should still compel Mt. Hood National Forest to address winter recreational travel on its lands.

Documentation of Decision to Exclude Over-Snow Vehicles from Travel Planning Needed

The 2005 Travel Management Rule does allow the regulation of over-snow vehicles. While Section 212.51 specifically *exempts* OSV's from being subject to limits on use of roads, trails and areas, Subpart C specifically provides *for* the regulation of OSV use. Section 212.80 begins, "The purpose of this subpart is to provide for regulation of use by over snow vehicles on National

Forest System roads and National Forest System trails and in areas of National Forest System lands.”

We believe that in order for the Mt. Hood National Forest to comply with Executive Orders 11644 and 11989 and the 2005 Travel Management Rule, an OSV Plan should include the following:

1. An analysis and determination of where known winter recreational user conflicts exist as well as an analysis of resource damage and negative effects on key wildlife species caused by OSV use.
2. A specific travel management plan for winter use, including designation of roads, routes, trails and areas for OSV use that minimize user conflicts with other legitimate winter recreation users, and addresses resource damage and negative impacts on key wildlife species.

Of course, but not including the any new snowmobile routes, Mt. Hood could avoid this process for the time being. However, we would still like to encourage Mt. Hood to undertake a proper OSV analysis in the near future, and certainly prior to designating any new OSV routes.

In conclusion, we appreciate your attention to the substance of these comments. We look forward to working with you and participating in this process to ensure the effective implementation of road decommissioning efforts. Please contact me if you would like further clarification on our comments or to further discuss the issues we have raised.

Sincerely,



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Appendix A

File Code: 2300/2500/7700 Date: November 10, 2010

Route To:

Subject: Travel Management, Implementation of 36 CFR, Part 212, Subpart A (36 CFR 212.5(b))

To: Regional Foresters, Station Directors, Area Director, IITF Director, Deputy Chiefs and WO Directors

Travel planning is intended to identify opportunities for the forest transportation system to meet current or future management objectives, based on ecological, social, cultural, and economic concerns. As you know, the Forest Service Travel Management Rule, promulgated in 2005, has three parts:

- Subpart A – Administration of the Forest Transportation System;
- Subpart B – Designation of roads, trails, and areas for motor vehicle use; and
- Subpart C – Use by over-snow vehicles.

Over the past 5 years, the Agency has made great strides in completing Subpart B of the Travel Management Rule (rule), which was prioritized in order to stop uncontrolled cross-country motor vehicle use. Approximately sixty-seven percent of National Forest System (NFS) lands are covered by a motor vehicle use map. It is anticipated that 93 percent of NFS lands will be covered by December 31, 2010.

Subpart A of the Travel Management Rule

This letter is to reaffirm agency commitment to completing those sections of Subpart A of the rule which requires each unit of the NFS to:

- Identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of NFS lands; and
- Identify roads that are no longer needed to meet forest resource management objectives and; therefore, scheduled for decommissioning or considered for other uses (36 CFR 212.5(b)).

By completing the applicable sections of Subpart A, the Agency expects to identify and maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns. Though this process points to a smaller road system than our current one, the national forest road system of the future must provide needed access for recreation and resource management and support watershed restoration and resource protection to sustain healthy ecosystems and ecological connectivity.

Process

Identifying the minimum road system and unneeded roads requires a travel analysis process that is dynamic, interdisciplinary, and integrated with all resource areas. With this letter, I am directing the use of the travel analysis process (TAP) described in Forest Service Manual 7712 and Forest Service Handbook (FSH) 7709.55, Chapter 20, to complete the applicable sections of Subpart A. The TAP is a science-based process that will ensure future travel-management decisions are based on the consideration of environmental, social, and economic impacts. All NFS roads, maintenance levels 1-5, must be included in the analysis.

For units that have previously conducted travel analysis or roads analyses (RAPs), the appropriate line officer should review the prior report to: 1) assess the adequacy of the analysis and the relevance of any recommendations to the process for complying with Subpart A; 2) help determine the appropriate scope and scale for any new analysis; and 3) build on previous work. A RAP completed in accordance with publication FS-643, "Roads Analysis: Informing Decisions about Managing the National Forest Transportation System," will also satisfy the roads analysis requirement of Subpart A.

Although the TAP does not include a National Environmental Policy Act (NEPA) decision, we expect line officers to engage the public in the process, which should involve a broad spectrum of interested and affected citizens, other State and Federal agencies, and tribal governments.

Results from the TAP must be documented in a travel analysis report, which should include:

- Information about the analysis and recommendations;
- A map displaying the recommended minimum road system;
- A list of recommended unneeded roads; and
- Further reporting requirements identified in Step 6 of FSH 7709.55, Chapter 20.

Each regional forester must certify that TAP reports for units within their region comply with this direction and are consistent with national policy.

In complying with this direction, units should seek to integrate the steps contained in the Watershed Condition Framework (WCF) with the six TAP steps contained in FSH 7709.55, Chapter 20, to eliminate redundancy and ensure an iterative and adaptive approach for both processes. We expect that the WCF process, and especially the initial watershed condition assessment (Step A) to be completed by March 31, 2011, will provide important information for your work on Subpart A, while the TAP process will likewise provide information for the WCF process. The intent is for each process to inform the other so that they can be integrated and updated with new information or where conditions change. However, the Agency expectation is that each process will move forward: units should not halt one process to wait for the other.

Timing

The travel analysis report must be completed by the end of FY 2015. Beyond FY 2015, no Capital Improvement and Maintenance (CMCM) funds may be expended on NFS roads (maintenance levels 1-5) that have not been included in a TAP or RAP.

Once certified by the regional forester, units are directed to immediately use the TAP reports to inform resource assessments, project and forest plan NEPA decisions to achieve the TAP recommendations.

Leadership

The Washington Office lead for Subpart A is Anne Zimmermann, Director of Watershed, Fish, Wildlife, Air and Rare Plants. Working with her on the Washington Office Steering Team are Jim Bedwell, Director of Recreation, Heritage, and Volunteer Resources, and Richard Sowa, Director of Engineering. I expect regions to create a similar leadership structure to lead this integrated effort.

This work will require significant financial and human resources. Your leadership and commitment to this component of the Travel Management Rule is important. Together, we will move towards an ecologic, economic, and socially sustainable and responsible national road system of the future.

/s/ James M. Pena (for) Joel D. Holtrop
JOEL D. HOLTROP,
Deputy Chief, National Forest System