

Appendix H: Response to Comments

Clackamas Road Decommissioning for Habitat Restoration, Increment 2

The proposed action along with a preliminary assessment was made available for public comment (36 CFR 215, 5/13/03) on November 16, 2010. Letters, e-mails, and written comments from an open house meeting were received during the 30-day comment period, which ended on December 20, 2010. The Responsible Official has considered comments received and has developed this Environmental Assessment in response to those comments. This appendix responds to comments that are within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider (36 CFR 215.2). The comments are in the analysis file; the following is a summary. In the responses, page numbers refer to the Environmental Assessment unless otherwise specified.

Comment	Response
<p>It was recommended that Alternative 2 be selected and specific roads (6311, 6321, 6330, 6340, 6341, 6350, and 6370) be closed rather than decommissioned in order to access large areas for fire suppression and non-vehicular recreation.</p>	<p>While none of the roads listed were specifically analyzed for closure, they are considered to stay as part of the Forest’s transportation system in Alternative 1 (No Action); thereby providing future access. Also, roads 6311, 6321, and 6330 are analyzed for decommissioning in Alternative 2; considered to stay as part of the Forest’s transportation system in Alternative 3; and only portions of these roads are analyzed for decommissioning in Alternative 4. The 6340 and 6350 are analyzed for receiving improvements in all of the action alternatives, rather than for decommissioning. The 6341 and 6370 are analyzed to stay as part of the Forest’s transportation system in Alternative 3; and Alternatives 2 and 4 decommission only a portion of these roads.</p> <p>Closed roads require some road maintenance and the Forest does not have sufficient fire suppression funding to maintain closed roads for the purpose of potential fire suppression. Access for recreation is addressed in the EA in section 3.9. While decommissioned roads would prohibit motorized vehicles, they would allow non-vehicular recreation.</p>
<p>It was recommended that Alternative 4 be selected with two modifications: (1) To keep either road 6370 open to Ogre Creek or close that portion rather than decommissioning it; (2) Close rather than decommissioning road 6340.</p>	<p>Road 6370 is analyzed as remaining on the Forest’s transportation system in Alternative 3. The 6340 is analyzed for improvements in each of the action alternatives.</p>

<p>One comment stated, “Over the years the trend has been to get away from the habitat management of our forests and to let them grow closed. This is now becoming very evident in the lack of wildlife in these areas. There is not enough forage to sustain them. There is however more than enough cover to not let the vegetation grow. This has seen the decline of elk and deer population plus I am sure some of the bird species.”</p> <p>Another comment stated they had concern there was a lack of analysis of vegetation management needed to produce early successional forest. They said, “The analysis of this issue [i.e., vegetation management] will not be complete until it addresses the animal species that are dependent on this habitat type and the expected production of this habitat type through timber harvest.”</p>	<p>Reduction in forage was predicted in the FEIS for the Northwest Forest Plan. The decline of forage due to reduced regeneration harvest would continue whether roads are present or not. Creating forage for wildlife is outside the scope of the purpose and need.</p> <p>In the wildlife section of the EA, it concludes that deer and elk populations are not expected to decrease to the point that deer and elk herds are not viable (p. 94). Also, populations are expected to stabilize as the population size becomes commensurate with the carrying capacity of the forage (p. 94). This project does not directly reduce the amount of habitat available to deer and elk.</p>
<p>The question was asked by one commenter, “in discussing wildlife’s impacts on wildlife, why was there no consideration of large fires helping create new forage opportunities?”</p>	<p>In the EA on page 94 it states that a decrease in the road network and the inability to easily reconstruct a road during a fire could result in larger fires, which “could potentially increase habitat for ungulates by creating large amounts of forage.”</p>
<p>It was recommended that Alternative 3 be selected and that specific roads be kept open for the use of hunters, camping, wood cutting, hiking, fishing and fire management. These roads included 6321, 6311, 6330, 6341, 7040, 7021 (seasonal opening for the Whetstone Trail and wildernesses), 7030, 4640, and 6370 (from the junction with the 6380 up to Ogre Creek washout for access to Round Lake by non-motorized traffic).</p>	<p>While the 6321, 6311, 6330, and 4640 are analyzed for decommissioning in Alternative 2, they are considered to stay as part of the Forest’s transportation system in Alternative 3; and Alternative 4 only decommissions a portion of these roads. The 6341 and 6370 are analyzed to stay as part of the Forest’s transportation system in Alternative 3. Alternatives 2 and 4 decommission only a portion of these roads. While the 7040 and 7030 are analyzed for decommissioning in Alternative 2, they are proposed to stay as part of the Forest’s transportation system in Alternatives 3 and 4. While the 7021 is analyzed for decommissioning in Alternative 2, only portions of this road would be decommissioned under Alternatives 3 & 4. Access to Round Lake is provided in all alternatives. Also, access to the Whetstone Trail (trail #546) is provided from road 7020, which is kept open in all alternatives. Road 7021 does not access any system trails.</p>
<p>It was recommended that the 7010 road be improved to reduce impacts to water quality since this is the only major access road coming from the town of Mollalla to the Forest.</p>	<p>The 7010 is analyzed for improvements in all of the action alternatives.</p>
<p>One comment stated, “All roads that are decommissioned should be planted with a seed mixture that provides good forage for wildlife.”</p>	<p>Based on the Region 6 Native Plant Restoration Program (April 2008), the Forest selects native plant species for seeding decommissioned roads that provide for forage for wildlife.</p>

<p>It was recommended that seasonal closures be used on roads providing access to hunters. It was also stated that seasonal closures would not meet the purpose and need.</p>	<p>Hunting access is addressed in the EA on pages 112-115. Alternatives 3 and 4 address the concerns raised by hunters (EA pp. 20-23). The Forest agrees that seasonal closures may not restore hydrologic function; however, if an aquatic risk is identified on a road that has a seasonal closure, then the road could receive storm damage risk reduction treatments to bring the road to a more hydrologically stable condition. Several roads identified in Alternative 4 are proposed to be closed and be stabilized (Appendix F).</p>
<p>It was suggested that only the minimum number of access roads be left open for BPA. Also, roads needed by BPA should be gated.</p>	<p>BPA access roads are described in the Issues section on page 18 of the EA, as well as the alternative descriptions on pages 20-23. The Forest has coordinated with BPA to identify which roads provide access to maintaining towers. It states that an entrance barrier device (e.g., gate) may be installed to deter access.</p>
<p>One comment stated that the following roads should be decommissioned in order to have benefits to wildlife: 6370, 6311, 6321, 6330, 6341, 7040, 7030, 7021, and 4640.</p>	<p>These roads are all analyzed for decommissioning in Alternative 2. Impacts to wildlife are discussed in the EA in section 3.6.</p>
<p>It was suggested that climate change “preparation” be added as an additional “purpose” of this project. Another comment said they would like to see an analysis of climate change and how this project would prepare the watershed to deal with anticipated severe winter storm events.</p>	<p>While climate change is not included as part of the purpose of this project, the impacts associated with climate change have been added to the EA on page 63.</p>
<p>It was recommended that the number of roads not being closed and information about the road maintenance backlog be disclosed in the EA. Also, one comment asked, “Can you also include deferred maintenance costs in the EA?”</p> <p>It was also recommended that the Forest demonstrate that many of the roads currently proposed for road decommissioning are not accessible by vehicle and therefore the proposed action does not limit access for a large number of the roads. Similarly, another comment stated that “Forest users need to be educated on the significant cost of maintaining roads, especially after blow-outs, the fact that this project will not impact any major recreation destinations, that they can still access their favorite places by foot, and the harms caused by the road network.”</p>	<p>Road maintenance backlog is addressed in the Transportation section of the EA on Tables 3.33 and 3.34; and deferred costs are incorporated in the total annual maintenance costs in Table 3.33. The table on page 126 (Table 3.36) displays the number of miles of roads that would be remaining after implementation.</p> <p>Alternative 2 would decommission about 82 miles of road that are currently at a maintenance level one status (i.e., closed to vehicular traffic); Alternative 3 would decommission about 65 miles of level one roads; and Alternative 4 would decommission about 68 miles of level one roads (EA pp. 125-126). The costs of maintaining the road network within the project area are discussed in the EA on pages 125-126.</p>

<p>Public comment suggested that there is scientific controversy over the benefits of thinning related to climate change. One comment letter stated that the analysis of forest carbon is “flawed.”</p>	<p>While certain non-peer reviewed opinion pieces are known to exist, they do not have sufficient scientific credibility to counter the array of published research that backs the assertions about plantation thinning. Research, such as Upton (2007) and Spies (2010), provide rationale for thinning. Also, refer to the references found in past thinning projects on the Forest, such as Upper Clack, Lake Branch, and Rethin.</p>
<p>One comment stated, “There needs to be places along the way for forest visitors to pull off of the main road, to do a bit of exploring, to enjoy and become familiar with the land, the topography, the vegetation and wildlife and water features, and to simply have a spot to rest off of the main road and maybe spend the night in peace and quiet.”</p>	<p>The effects to dispersed recreation are discussed in the EA on pages 111-113. Additional information was added to the EA to state that while some access for this type of use would be reduced, the opportunity for this type of use on the Clackamas District as well as the rest of the Forest would still remain.</p>
<p>One comment suggested that if “a road is abandoned and blocked but left in place and restricted to non-motorized travel, then it does not need to be designated a ‘trail’ and does not need to call into play all the bureaucratic standards and policies that go along with that designation.” Rather, the commenter asked that some of the roads proposed for decommissioning be considered as “pathways” for non-motorized trails. An example of a good candidate for this is road 6300-170. It was also requested that the 6380-125 be left in place as it is.</p>	<p>Roads proposed for decommissioning will have vehicle access blocked (EA p. 13). Treatment techniques used are described in the EA on pages 9-14. In the short term, there is the potential for some of the roads to be walkable while the road beds revegetate. In the long term, decommissioned roads may be walked and may resemble natural forested areas. Wildlife and forest users may use these areas leaving evidence of a “pathway”; however, the Forest would not be establishing or maintaining these areas. Also, if resource impacts develop from “user-created pathways”, then corrective actions may be taken to restore the area. Road 6300-170 is analyzed to stay open in Alternative 3; and proposed for decommissioning in Alternatives 2 and 4. Road 6380-125 would stay open in Alternative 1; and this road is addressed in the Decision Notice.</p>
<p>A commenter said that closing the 4650 would prevent access to the northern trailhead for the Burnt Granite Trail (trail #595). Also, it was mentioned that access to the Baty Butte Trail (trail #545) would be lost by road decommissioning.</p>	<p>All action alternatives would decommission a section of 4650 road. The EA disclosed that access to the Burnt Granite Trail would remain, but would require a nine mile alternate route to get to the trailhead from the southeast on road 4670 (p. 114). Access to the Baty Butte Trail was closed as part of a previous NEPA decision for the Fish Creek Project. Access to this trail is still possible coming from the BLM lands.</p>
<p>A commenter stated that matrix lands are not discussed in the vegetation management assessment. Also, one comment said, “I don’t see the Forest wide vegetation management strategy mentioned anywhere in this assessment. This should be a primary component of the assessment that determines which roads stay open for management activities.”</p>	<p>The forest’s vegetation management plans for the westside of the Forest focus primarily on plantation management. Even though other types of management are allowed by the Northwest Forest Plan, they are not reasonably foreseeable at this time.</p>

<p>Because of the recent expansion of the wilderness and resulting loss of mountain bike trails, some expressed that it was disappointing that none of the alternatives provide any significant plans for road to trail conversion.</p>	<p>The primary purpose of this project is to restore watershed health and protect aquatic habitat with road decommissioning; therefore, “significant plans” for trail conversion and construction were not included in this project. For the reasons described in the EA on page 19, expanding road to trail conversion was considered, but dropped from detailed study. Also, road decommissioning efforts do not necessarily preclude future development of trails on the District. The Forest has worked with interested partners to construct mountain bike trails in the last ten years, and looks forward to continuing to work with user groups in identifying user needs. Typically, the development of mountain bike trails are done in a trails management project (e.g., Timberline Mountain Bike Trails project and Government Camp Trails project) that can identify specific Trail Management Objectives (such as potential destinations, user difficulty levels, trail design elements, length of trail system, and necessary amenities like trailhead parking) (see the Forest Service Trails Handbook 2309.18 for a complete description of the trails planning process).</p>
<p>One comment stated that the “analysis regarding revenue from timber sales sufficiently paying for certain roads in perpetuity fails to take a comprehensive look at the current realities on the forest.” The comment also states, “by decommissioning certain roads it does not preclude future entry into some of the plantation stands in the second or third decade, but in the meantime allows the area to recover and provide greater wildlife and water quality benefits, while not requiring road maintenance funding.”</p>	<p>The EA as a whole represents the agencies comprehensive look at roads. The intent of the vegetation section in the EA is to describe the effects to vegetation management. While some decommissioned roads may be rebuilt in the future, other roads would be cost prohibitive.</p>
<p>It was recommended that the Forest provide a timeframe and implementation schedule for road decommissioning in order to better enable their ability to partner. Also, there was interest in knowing how implementation would be prioritized and if there was “treatment strategy.”</p>	<p>As stated in the EA on page 20, implementation is dependent on available funds. Because we are uncertain about funding, specific timelines associated with implementation are also uncertain and not identified in the EA. If there is specific interest in understanding the implementation process, please contact the Forest’s engineering department to set up a meeting to discuss further.</p>

<p>It was suggested that the Forest Service to be less defensive in the final environmental assessment about the financial burden that trails create for the agency. It was mentioned that the EA should discuss current trail funding shortfalls as an immediate obstacle, to be sure, but not presume to predict the future of recreation funding. One comment stated that there are a number of ways in which trail maintenance costs can be reduced, while simultaneously expanding the trail system. If adding trail mileage with road conversions increases trail maintenance costs and backlogged trail maintenance needed, then it was stated that the EA should better support this statement. Also, a commenter stated that if the Forest’s policy is not to expand trail mileage, then it should be referenced.</p> <p>Some commenters expressed frustration due to the “disregard shown to hiking interests” while suggestions by hunting groups were included in the alternatives. Also, the public stated, “Hiking and biking opportunities in the project area but outside the wilderness area are sorely lacking.” It was specifically asked that the 6311 be converted to a trail; and that the Forest “take a look at road to trail opportunities throughout the project area with a fresh set of eyes and reevaluate the opportunities that may not have yet been considered.”</p>	<p>We apologize for sounding defensive in the Preliminary Assessment – budgetary limitations always get the best of us! The “affected environment” section of the EA on page 111 now includes a discussion about the Trails Capital Investment Program (CIP) funding process and selection criteria. Also, the project record contains a document that estimated wilderness and non-wilderness trail maintenance and reconstruction costs.</p> <p>Over the past 15 years, the Forest has relied heavily on volunteers and partners to maintain trails. Besides relying more heavily on partners, it is unclear as to the number of ways in which trail maintenance costs could be reduced while simultaneously expanding the trail system. The Forest is interested to hear more about that approach; however, as described in the EA on pages 19-20, trail expansion and construction does not meet the purpose of this project. A more appropriate time for this discussion could occur during a future recreation planning effort.</p> <p>The IDT re-evaluated the potential for converting roads into trails (EA pp. 19-20). For the reasons described in the EA on pages 19-20, expanding road to trail conversion was considered, but dropped from detailed study. While converting roads into trails can be an option when decommissioning a road, the development of new trail systems was not part of the purpose and need for the project; and therefore outside the scope of this document. However, it is important to also mention that road decommissioning efforts do not preclude future development of trails on the District. In the future, if there is funding and broad based support to do some trails master planning on the District then the Forest would work closely with these partners to meet trail master plan goals.</p> <p>Alternative 2 would decommission the 6311 road; Alternative 3 would leave the road open; and Alternative 4 would decommission approximately the last two miles (out of almost five miles total). The IDT re-evaluated this road for potential conversion into a trail (EA p. 20) and concluded that there was no compelling need for making this a trail because other trails in the area already meet the recreation need. It would still be possible for forest users to access this road by foot.</p>
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<p>A commenter said they were interested in having equestrian access on decommissioned roads.</p>	<p>The IDT re-evaluated the potential for converting roads into trails (EA pp. 19-20). For the reasons described in the EA on pages 19-20, expanding road to trail conversion was considered, but dropped from detailed study. While converting roads into trails can be an option when decommissioning a road, the development of new trail systems was not part of the purpose and need for the project; and therefore outside the scope of this document. However, it is important to also mention that road decommissioning efforts do not preclude future development of trails on the District. In the future, if there is funding and broad based support to do some trails master planning on the District then the Forest would work closely with these partners to meet trail master plan goals.</p>
<p>One comment stated, “In general, our greatest concerns pertain to the actual implementation of this project. We remain deeply concerned that decisions on whether and how to actually decommission a road continue to be heavily influenced by vegetation management, despite the fact that this is outside the purpose and need for this project.”</p>	<p>The primary purpose of this project is to restore hydrologic function on unneeded roads (EA pp. 7-8). Decommissioning techniques are described in the EA on pages 8-14. If additional information or clarification is needed to discuss implementation techniques, please contact the Forest’s engineering department to set up a meeting to further discuss.</p>
<p>A commenter is concerned that passive road decommissioning would be used where it is “inappropriate”. It was recommended that all culverts and crossdrains be removed in passively decommissioned roads.</p> <p>Also, a commenter stated that they concerned that if too many roads are passively decommissioned, then the Forest will have a vast “ghost” network.</p>	<p>The primary objective of this project is to restore hydrologic function, so road decommissioning treatments would be implemented based on achieving this objective. In some instances, a road may already be stable and it is not the Forest’s intent to disturb the ground that does not need it (EA p. 9). However, if there are associated risks to aquatic resources caused by culverts, then they would be removed. The anticipated decommissioning treatments are discussed in the EA on pages 8-14. The project file, found at the Forest Supervisor’s office in Sandy, OR, contains survey data that describes each road’s current condition and potential treatment needs. All of the impacts associated with the decommissioning techniques listed in Table 1.1 have been analyzed by all resources (EA Chapter 3). Roads identified for passive decommissioning would receive a 660 feet entrance treatment (EA p. 13). If additional information or clarification is needed, please contact the Forest’s engineering department to set up a meeting to further discuss.</p>
<p>Concern was expressed for barrier closure devices being “wildly ineffective throughout the forest.” It was recommended that decommissioned roads be obliterated to sight distance.</p>	<p>Recent third party monitoring effort conducted by the Clackamas Stewardship Partners found road closures to be effective 80% of the time. All of roads proposed for decommissioning would receive a 660 feet entrance treatment (EA p. 13).</p>

<p>It was recommended that the EA address how the road decommissioning projects on the Forest fit into the direction provided in Holtrop’s November 10, 2010 memo.</p>	<p>Legacy roads have been addressed on the Forest under a strategy developed to reduce adverse hydrologic impacts of forest roads on aquatic resources (EA Appendix B). Beginning in fiscal year 2008, a multi-year, incremental approach was initiated using a system of priority river basins and focus watersheds to address road-related restoration needs in alignment with the region's aquatic restoration strategy (EA Appendix B). Subpart A of the Travel Management Rule requires each unit to identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of National Forest System lands; and to identify roads that are no longer needed to meet forest resource management objectives. Subpart A of the Travel Management Rule is therefore broader and more inclusive than the current strategic approach, however many elements are similar. The current incremental process outlined in Appendix B includes NEPA decisions, whereas the Travel Analysis Process does not.</p> <p>We are in the preliminary stages of discussions in addressing the direction provided in Holtrop’s memo. Currently, the Forest is working to complete the analysis steps contained in the Watershed Condition Framework, which will then provide important information for work on Subpart A. Two forests in the Region have been selected as pilot forests in 2011 to work on Subpart A of the Travel Management Rule. It is expected that the work of the pilot forests will help inform the process for the remaining forests in the Region.</p>
<p>A comment stated that the ESA compliance section seems cursory, and it does not even mention bull trout reintroduction.</p>	<p>Information regarding bull trout has been added to the EA on page 66.</p>
<p>A commenter stated, “We are surprised to see the MHNF has not considered the impacts of this year’s 9th Circuit Court of Appeals ruling which held that Forest Roads are point sources under the Clean Water Act.”</p>	<p>In <i>Northwest Environmental Defense Center v. Brown</i>, the 9th Circuit ruled that it considers storm water runoff from logging roads collected by ditches and culverts and discharged into streams to be a discharge of pollutants from a point source subject to permitting requirements of the Clean Water Act. This case involved environmental groups, private timber operators, and Oregon state officials; the FS is not immediately bound by this ruling. If it is determined that the Forest Service needs to obtain a permit for the discharge of storm water from logging roads, then the agency will work closely with EPA and the State to do so. The IDT did not feel that this court case or potential outcome to obtain permits was relevant to their analysis of impacts associated with road decommissioning.</p>
<p>It was recommended that the PDCs for “fisheries should require a fish biologist or hydrologist to be on site and given authority to stop or change the course of work whenever sensitive work around streams is being done.”</p>	<p>The PDC on page 23 (F-1) states that a fisheries biologist and/or hydrologist would participate in the design and implementation of this project.</p>

<p>A commenter asked if there were any possible benefits to the northern spotted owl and their habitat (i.e., more contiguous habitat and decreased road density) for road decommissioning. They stated that the analysis said that northern spotted owls could be harmed by road decommissioning because of increased fire response time, and that this assumes that the response to fires in this area will always be suppression, which was not the case this past summer.</p>	<p>In the Wildlife section of the EA it states that in the long term, “the decommissioned roads would grow into forested stands and begin to provide a prey base for spotted owls” (p. 86). It continues to state, “These roads would likely become dispersal or maybe even suitable habitat for the spotted owl in the future” (EA p. 86).</p>
<p>A comment stated, “We do not believe that somehow things are about to change and these timber sales are going to pay for ongoing maintenance of the vast road network in the area or for access to recreation facilities.”</p>	<p>The analysis does assert that things are about to change. Restoration thinning projects do provide road maintenance. The analysis makes the case that the combination of allocated funding and thinning funding along with a smaller road network the Forest can meet its transportation and vegetation management objectives.</p>
<p>One comment stated, “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.”</p>	<p>Project specific effects can only be addressed when a firm site-specific project proposal is made. A project is not considered “foreseeable” under NEPA until that site-specific proposal is made. The type of analysis requested would be speculative and generic at best. This type of landscape scale analysis has been conducted for the Forest Plan and the Northwest Forest Plan (contained in their respective EISs). The line officer has been sufficiently informed about road decommissioning decisions based on the total analysis contained in this EA.</p>
<p>It was recommended that the EA consider the economic impact road decommissioning will have on ecosystem services in the project area and the economic impacts of improved watershed health. In addition, the EA should consider the economic impacts of changed human use patterns.</p>	<p>As stated in the Decision Notice on page 2, the decision maker believes that the IDT has analyzed all pertinent ecosystem services that this project would have an effect on.</p>