

Audubon Society of Portland Bark Mazamas
Oregon Wild Pacific Rivers Council Oregon Chapter of the Sierra Club
Trout Unlimited Wildearth Guardians

February 8, 2015

Lisa Northrop, Forest Supervisor
Mt. Hood National Forest
Sandy, OR 97055

Dear Ms. Northrop,

We are writing to express our interest in working with you to develop a strong Travel Analysis Report that is a blueprint for "... an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns." (USFS WO Memo, March 2012). In order to meet the intent of the direction from the Chief's office re: Travel Management Planning - Subpart A (36 C.F.R. 212.5(b)), we believe the analysis will show that a significant reduction in the size and density of the road system in Mt. Hood National Forest (MHNF) is needed. The Roads Rule directs each national forest to identify: 1) the minimum system of roads needed for public and management access; and 2) a list of roads that are no longer needed and therefore should be decommissioned. We understand that the Travel Analysis Report is the first step in identifying the minimum system of roads, which is why it's extremely important that the analysis is thorough, defensible and built upon a foundation of science.

A strong, forward-looking Travel Analysis Report (TAR) that leads to the decommissioning of unneeded and harmful roads will benefit forest visitors by improving maintenance on needed roads to campgrounds and trailheads. Decommissioning helps reduce the impact of roads on ESA listed fish species, such as coho, Chinook salmon and bull trout. It will also build on the good work completed by Mt. Hood National Forest during the road Increments process.

As Representative Earl Blumenauer mentioned during his meeting with you and your staff, in August 2014, the size of the road system needs to be reduced because it is unsustainable. The budget for road maintenance has decreased which means that only a fraction of the road miles could be properly maintained last year. The result is that more roads are in unsatisfactory condition leading to an ever increasing, costly, maintenance backlog. We would like to see the forest take steps to implement the finding of the *MHNF Access and Travel Management Plan* (1999) that "49% of roads on the Mt. Hood National Forest could be closed or obliterated."

Given the importance of water resources in Mt. Hood National Forest, including municipal water supplies and habitat for riparian and aquatic species, it is critical that the Forest Service continue to build on its past efforts to reduce the amount of roads in the forest. We would like to work with you and your staff to help MHNF be a leader in road decommissioning to improve watershed health.

We would like to meet with you soon to discuss the following issues and find out how you'll address them in the Travel Analysis Report.

Road densities are negatively impacting aquatic and terrestrial habitat -

The importance of reducing road-related impacts on aquatic and terrestrial ecosystems has not diminished since the Northwest Forest Plan and Aquatic Conservation Strategy were adopted in 1994. In fact, it has increased in the face of climate change and decreased budgets for road maintenance. Road density must be reduced at the watershed-level, forest-wide, and roads whose maintenance is unfunded need to be decommissioned.

High road densities have an adverse impact on bull trout, ESA listed salmon (Fall and Spring Chinook, coho and steelhead) and other species that depend on high quality water and watersheds that are in good condition. The agency's Watershed Condition Framework Classification Technical Guide defines watersheds with open road densities greater than 2.4 mi./sq.mi. as "poor – impaired function" due to the higher probability that the hydrologic regime is substantially altered. Unfortunately, there are approximately thirty nine 6th field sub-watersheds in MHNH that exceed the 2.4 mi./sq.mi. threshold.

To correct this situation we ask that you use the Travel Analysis Process to recommend:

Reductions in road density at the 5th field sub-watershed scale Forest-wide to less than 1.5 miles per square mile. All system roads, non-system roads, and decommissioned roads (with prism intact) shall be included in the road density calculation. Increases in net road density in any watershed are not permitted.

The size of the current road system is unsustainable –

There are still many more roads than are needed for current and future activities. Decommissioning a significant number of miles will reduce impacts to aquatic and terrestrial ecosystems and make the landscape more resilient in the face of changes in precipitation and storm events due to climate change. The size and density of the road system is a contributing factor to the hydrologic connectivity of roads to stream systems. Decreasing the overall road mileage and density will help reduce hydrologic connectivity and the delivery of sediment, to streams, from ditches, culverts and other features of the road system.

The MHNH Access and Travel Management Plan (1999) stated that "49% of roads on the Mt. Hood National Forest could be closed or obliterated" and identified 1676 miles as "closed or available" for closure (p. 6 and Appendix 1). The 1999 ATM listed a total of 3463.8 miles in the road system. The Clackamas River Ranger District should be one of the focal areas, for road decommissioning recommendations, in the TAP because the 1999 ATM noted that "58% of roads available for closure or obliteration are on Clackamas River Ranger District" (ATM, p. 6). *We would appreciate an update from you regarding the actual changes in the road system since 1999 including: number of miles that have been decommissioned; number of miles that have been closed; and the mileage of decommissioned roads that have been re-opened.*

We recommend that the road management recommendations in the TAR need to: ***meet, or exceed, a 49% reduction from the size of the road system in 1999 and that the Clackamas River Ranger District be one of the focal areas for road decommissioning.***

Roads impact Key Watersheds, bull trout, listed salmonids and the Northern Spotted Owl -

Roads can have dramatic and lasting adverse effects on fish and aquatic habitat by increasing sediment delivery to streams, damaging spawning habitat, changing the water temperature and limiting the availability of large woody debris. The U.S. Fish and Wildlife Service's Final Rule listing bull trout as threatened, stated: "Bull trout were less likely to use highly roaded basins for spawning and rearing, and if present, were likely to be at lower population levels." (USDI Fish and Wildlife Service 1999). Noise from vehicles travelling on roads can cause Northern Spotted Owls (NSO) to avoid roads, fledge fewer young and may decrease NSO reproductive success over time. We would like to know how the TAR will address the newly designated NSO Critical Habitat Units and how risks for Northern Spotted Owls, bull trout, listed salmonids and other listed and sensitive species will be evaluated.

A key role of federal forest land is to provide high quality habitat for listed and non-listed species and high quality water for human communities. Therefore the TAR needs to: ***Prioritize road decommissioning in Key Watersheds (Tiers 1 and 2) and areas where roads may impact bull trout, listed salmonids, the Northern Spotted Owl and/or other listed species or their habitat.***

Public access to recreation sites is threatened when roads are continually neglected -

Recreation activities, ranging from fishing and hiking to berry picking and camping, are the way in which many people relate to and enjoy Mt. Hood National Forest. In 2012, the forest received just over 6 million recreation visits when all activities were counted (Mt. Hood NF website, 2014). The opportunity to visit the forest contributes to the quality of life for people in the Portland - Vancouver metro area and communities that surround the forest. Recreation is increasing in importance as an economic driver; in 2011 it contributed approximately \$60 million in payroll alone to the communities around the forest (Dallas Fridley, Oregon Employment Department on OPB radio, 6/13/11). No one benefits when the road infrastructure, that provides recreation access, deteriorates because the limited maintenance funds are being spread too thinly over a large road system.

Given the importance of recreation we recommend that: ***Roads to key recreation sites and trailheads should be maintained to a level that provides safe, reliable access for passenger vehicles.***

The road system is vulnerable to the effects of climate change -

We believe that a thorough Travel Analysis Process is not complete without considering climate change. In the 2013 USFS report titled "Assessing the Vulnerability of Watersheds to Climate Change", road improvements were identified as a key action to improve the condition and resilience of watersheds. Improvements include treatments to reduce erosion, road changes to reduce runoff delivery, and restoring connectivity of aquatic habitat. Region 6's guidance for Travel Analysis states that "climate change risks can be incorporated into the analyses" because the frequency and magnitude of storm events may increase and cause significant road damage and effects on ecosystems.

We recognize that it is difficult to assess precisely where and how climate change will impact Mt. Hood. However, there are some general assumptions that can be made regarding precipitation, hydrologic responses, and road vulnerabilities. In particular, we recommend that you put a special focus on areas where floods and landslides could increase. Will recreation access be disrupted? Do stream crossings need to be prioritized for improvements? Can road removal prevent future high maintenance or emergency repair costs? Where are the highly vulnerable watersheds? Where will flooding become more problematic for roads? Much of this information exists through the Forest Service and other groups, such as the University of Washington Climate Impacts Group.

Given the damaging impacts of increasingly large storms on infrastructure, we recommend: ***The Travel Analysis Report incorporate climate change information and offer recommendations on building resilience to impacts.***

The cost of the existing road system is unsustainable –

The annual cost for basic maintenance of Mt. Hood’s road system is nearly \$5 million yet the forest has seen a steady decrease in funds; not equating to these basic road maintenance needs (only \$770,000 in 2013). This annual maintenance cost does not even begin to address the growing \$52 million backlog of maintenance needs. It is overwhelming to consider how to balance such a disparate budget but we believe this effort should be made.

The USFS Washington Office and Region 6 guidance confirm that Travel Analysis must include an evaluation of the affordability of the road system to ensure it “reflects long-term funding expectations” (36 CFR 212.5). We believe that this is an important component of the Travel Analysis Process – not only because it is required, but also because it provides an important opportunity to educate forest users, local communities and decision-makers on the challenges the forest faces.

Here are some suggested examples of how different economic scenarios can be applied to the analysis to provide a more complete picture of the challenges the agency faces and what different options would look like. We feel this could help the forest in framing discussions with partners and be a foundation for exploring real opportunities to right-size the road system.

Examples are as follows:

1. Extreme Bookend A – Assumes all 2,881 miles of road remain on the system for the next 10 years and are all maintained annually at their current maintenance level. Assumes the entire deferred maintenance backlog would be addressed in 10 years. Total cost = ?
 - a. Road miles = 2,881 open
 - b. Annual maintenance cost = \$
 - c. Annual cost to address deferred maintenance needs = \$
2. Extreme Bookend B – Assumes the current trend of decreasing maintenance funds continues over the next 10 years at a decreasing rate of 10% per year. Assumes only the roads that receive annual maintenance can remain open and on the system. Assumes deferred maintenance continues to grow. Total cost = ?
 - a. Road miles open = X
 - b. Annual maintenance cost = \$
 - c. Annual deferred maintenance cost = \$

- d. Road miles to be closed due to lack of maintenance funding = Y
- 3. Recreation centric scenario – Assumes all roads to primary and secondary recreation destinations receive annual maintenance. All key roads, with high recreation use, are improved for passenger vehicle use (ML 3 or higher). Assumes a portion of the deferred maintenance backlog would be completed each year on the primary recreation access roads. Total cost = ?
 - a. Road miles open, per ML =
 - b. Annual maintenance cost = \$
 - c. Annual deferred maintenance cost = \$
- 4. Aquatic protection centric scenario – Assumes roads scored with the highest impacts to aquatic resources are removed from the system and roads scored with medium impacts would receive deferred maintenance to reduce risks. Total cost = ?
- 5. Changing Maintenance Level (ML) composition scenario – Assumes major changes to current operational maintenance levels are needed across the forest. Assumes a portion of the deferred maintenance backlog would be completed each year on the highest maintenance level roads. Total cost = ?

We recommend that the TAR for Mt. Hood National Forest: ***Analyze and discuss a variety of economic scenarios that begin with extreme bookends yet also contain some issue-focused scenarios with assumptions clearly laid out.***

Reducing the Maintenance Level designations won't solve the budget problem –

By including a thorough evaluation of the affordability of the road system to ensure it “reflects long-term funding expectations” you can help forest visitors and interested parties understand that it is inadvisable to simply use a strategy of reducing the Maintenance Level designations for roads. While that may make it seem that the agency can afford a larger road system this strategy prolongs the impact from under-maintained roads and postpones the time when decisions will need to be made to decrease the size of the road system to fit current and future budget realities. We suggest that it is better to make realistic recommendations, in the Travel Analysis Report now, so that decisions to decommission roads for which no maintenance funding exists can be made in NEPA documents in the next 2 – 6 years.

Given the increasing high costs and small budget for the road system, we recommend: ***The Travel Analysis Report not be based on a strategy of reducing the Maintenance Level designations to make the road system “fit” the declining budget.***

There is not a compelling need to keep every existing road –

Simply because there was a need for a road in the past doesn't mean that there will be a need for it in the future. A memo from the Forest Service's Washington Office (March 2012) states: “The TAP is a science-based process that will inform future travel management decisions.” As noted earlier, that memo also discusses the need to identify “... an appropriately sized and environmentally sustainable road system” This necessitates a TAR that makes the analysis clearly visible and easily understandable.

So that the public can understand the agency's rationale for why it is proposing to keep a specific road we recommend that the TAR needs to: ***State the reason(s) why a road is needed, the timeframe during which the road is needed and what purpose it will serve.***

Public needs and expectations for the road system have changed –

We appreciate the list of changed conditions that the TAP team developed to identify conditions that have changed since the Roads Analysis was completed in 2003. In the 12 years since the Roads Analysis was completed there have been other changes that affect how people use the forest.

We recommend: ***The analysis in the TAR also include the following changed conditions -***

- Recreation and tourism have become more important in the local economy.
- Many of the communities surrounding the forest have grown and the demographics are still shifting. As an example, Sandy has continued to grow and is more of a bedroom community now than in the past.
- Mountain biking has increased in popularity and riders have demonstrated a willingness and ability to raise funds to build trails and volunteer to complete trail maintenance projects. This increases the feasibility of doing road-to-trail conversions.
- The road system is 12 years older than it was in 2003 and deterioration, due to the declining maintenance budget, is evident on many roads.

Unneeded roads may provide more public benefit as trails –

Where appropriate we encourage you to identify unneeded roads for conversion to a trail to provide new opportunities for hikers, equestrians, or mountain bicyclists. Doing this in the TAP can help start the process of exploring and evaluating opportunities for a user group to be involved in the implementation, maintenance and perhaps funding of a conversion. We recognize that the budget for trail maintenance has also declined so it may seem counterintuitive to suggest road-to-trail conversions. However, the reality is that the agency doesn't have money to maintain all of the roads and there are cases where mountain bikers are using a road to make a loop with an existing trail. Converting a road to a trail can also reduce the impact of the road on water quality and nearby habitat. Some of the groups signed on to this letter may be able to assist with securing grants or other funding for conversions.

If a particular road location could provide a good trail opportunity then it should be identified as such. How to make it happen comes later in NEPA and discussions with potential partners. We recommend that: ***The TAR be creative and forward looking in its approach to identifying the future transportation system – both roads and road-to-trail conversions – for Mt. Hood National Forest.***

Thank you for your consideration of these issues that are important to our thousands of supporters. We look forward to meeting with you soon to discuss them. Russ Plaeger will contact you regarding scheduling a mutually convenient meeting date.

Sincerely,



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