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RE: Comments on Preliminary Assessment, Clackamas Road
Decommissioning for Habitat Restoration, Increment #2, Collawash

December 15, 2010

Dear Michelle,

The following are the comments of the undersigned groups and individuals on the Preliminary Assessment ("PA") and associated materials for Increment 2, Clackamas Road Decommissioning for Habitat Restoration ("Collawash Road Decommissioning"). As recognized in this PA, roads are a major source of environmental harm in Mt. Hood National Forest ("MHNF") and our current road network is impossible to maintain. We support your efforts at permanently reducing the number of miles of roads in Mt. Hood National Forest.

We support Alternative 2. We appreciate the efforts of you and the rest of the ID Team in undertaking this ambitious and comprehensive analysis of roads in the Collawash and making Alternative 2 a strong alternative. We also appreciate your inclusion of specific information we discussed in our

post-Zigzag Road Decommissioning appeal resolution meetings. This includes the list of roads and rationale for proposed action, specifics about what is meant by the term “decommissioning,” and the information about the costs of road maintenance.

The following is a summary of our main points. Following this list are our comments on the various portions of the PA and then finally our site specific recommendations.

1. 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. We urge Mt. Hood National Forest (MHNH) to make implementation choices that maximize ecological benefits for the watershed. Bark and other stakeholder groups work tirelessly to ensure continued funding of Legacy Roads and Trails monies. We urge you to maximize the opportunities provided by that excellent funding source to do what is best to restore this watershed, regardless of anticipated future logging projects.

We would like to participate in the implementation phase of this project by having an ongoing conversation with staff about the prioritization process, specific prescription decisions, and monitoring. Also, please provide an anticipated timeline for the various roads in your Environmental Assessment.

2. We are concerned about passive road decommissioning being used where it is inappropriate. The description of when passive road decommissioning will be used is often in situations where the road is largely grown over. We have collectively spent hundreds of hours in the Collawash looking at old

roads and have very rarely come upon situations where trees are growing out of road beds. We often see branches and overgrowth from nearby trees covering unused roads and sometimes some grass, but the old road bed is still very much intact and still causing harm to aquatic resources.

We are also concerned about passive decommissioning being another term for storage. Congress did not allocate money to the Legacy Roads Program so that Forests could decommission and recommission roads as convenient. These funds should be applied to permanent solutions. Applying passive decommissioning or putting a road into storage creates a ghost road network. A ghost road network could harm aquatic habitat, especially in the event of a large storms that are expected to become more frequent as our climate changes, and it could also provide safe harbor for illegal activities such as drug manufacturing and OHV use. We urge you to save passive decommissioning for very rare occasions and actively decommission roads as often as possible. We also invite dialogue about how we can help you work with volunteers to help actively revegetate old road beds.

3. Alternative 2 is the only reasonable alternative. Alternative 3 should not be considered and Alternative 4 should not be considered a compromise. Both of these alternatives essentially disregard the urgent need for restoration by removing every single road mentioned by the Bonneville Power Administration ("BPA") and hunting groups from the analysis. The interests of these groups should not override every other consideration. The public should not be forced for pay, indefinitely, for the maintenance of roads that have extremely limited uses and that simultaneously harm our natural resources. All roads included in Alternative 2 should be included in the final decision. Then, and only then, should you meet with those interest

groups and determine which roads you may not want to prioritize for decommissioning in the immediate future.

4. The disregard shown to hiking interests in this PA is astounding. Every single suggestion provided by hunting groups was incorporated into an alternative, yet every single suggestion provided by hiking interests was disregarded. Hikers are the main recreation group on Mt. Hood National Forest and their comments reflect decades of acquired knowledge of the area. Their buy-in is essential for the Forest Service to avoid the backlash other Forests have experienced when forced to make tough choices about decommissioning roads used by recreationists. Not only is their volunteer labor essential for keeping our trails open, but hiker's organization leaders are also essential for communicating Forest Service goals to their communities, who may otherwise be upset about not being able to access favorite dispersed camp sites. Hunters and loggers are not the only groups with a legitimate interest in this area, but the PA reflects an open bias towards these interests. MHNF needs to promptly reach out to hikers and bikers, especially, the organizations that suggested road to trail conversions and other opportunities; attempt to correct the damage done by the PA's response to their comments; and work to incorporate at least some of their very reasonable suggestions.

5. Communicating the intention and need for road decommissioning can be a challenge with certain individuals and groups. We encourage you to highlight the numbers provided in the PA's Transportation Analysis. At the open house we heard a few members of the public expressing their perception that MHNF is planning on using their money to reduce their access to the Forest. 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. Many if not most forest visitors who have gotten lost because the road network is so confusing or have been unable to reach anticipated destinations because of road maintenance delays after storms. They need to be educated on how this project will actually lead to better experiences on a leaner road network.

Comments on the PA

I. Purpose and Need

We appreciate that the purpose and need of this project has been expanded from just addressing aquatic habitat to now addressing water quality and riparian habitat as well. This fits the overall spirit of the project better and allows for a broader analysis. We also note that preserving access to plantations is not listed in the purpose and need. The maps provided in this section provide a useful frame of reference.

II. Background

It is nice to read in this section about how this project fits in with the larger issues of transportation planning. While we appreciate the mention of the minimum road system, we remain curious about exactly how this system will fit in with this process.

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 memo does not allow forests who have previously 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 MHNH 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, the analysis was conducted on paper without the necessarily extensive field verification. In addition, conditions have changed significantly. We have substantial new information about roads in general and new information specific to Mt. Hood's roads. Both Bark's roadtruthing reports and the reports submitted by the Clackamas Stewardship Council have found that approximately 25% of all decommissioned roads in the Clackamas Ranger District might not be on the map but they certainly look like roads on the ground because they are actively being used, mostly by OHVs.

This new information is not the only reason to improve on the previous analysis. 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. Mt. Hood now has had decommissioned or has plans to decommission hundreds of miles of roads. 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.

III. Proposed Action

This section mentions that roads in the project area will be decommissioned over "several years." PA at 7. As we have discussed in the past, the public needs more certainty on the timeline the agency anticipates. Simply saying "several years" is not good enough. At the very minimum, we would like to know which roads are immediate priorities, which roads might wait a couple years, and which roads you don't anticipate getting to for a while. Appendix C provides some insight into this by letting us know which roads you are planning on using for thinning and when, but it does not provide us with a sense of priorities that are necessary for us to make informed comments. In that vein, it would also nice to have a better sense of how you would prioritize projects. We would like to participate in this prioritization process.

We are also concerned that the NEPA for this project is likely to go stale before decommissioning can be implemented, especially for roads slated for

thinning in 10 years. At that time we can expect a new Forest Plan and additional climate change related concerns to constitute significant changed conditions. For this reason, we urge you to decommission as many roads as you can in the next couple of years while Legacy Roads funding remains available. These opportunities should be seized.

The definitions of active and passive decommissioning go a long way to aid our understanding of what you mean when you say decommissioning. However, here you mention that barriers will be used in both active and passive decommissioning unless they are shown to be ineffective tools, then obliteration to sight distance would be prescribed. PA at 8. Barrier closure devices are wildly ineffective throughout the forest; especially in places with prevalent OHV use, legal and illegal, such as LaDee Flats. They point out that a road was once there and invite Forest users to devise ways to overcome them. For this reason, we urge you to avoid using these devices and instead obliterate all decommissioned roads to sight distance.

The description of passive decommissioning does not mention that all culverts and cross drains will be removed, despite the damage they can do if unmaintained. Keeping any of these features in place would be highly controversial and we urge you to remove them. Please explain the plan for these devices on passively and actively decommissioned roads.

As mentioned above, our experience indicates that the roads described as fitting the bill for passive decommissioning don't really exist in the Forest. The vast majority of these roads are simply grown over, the road beds do not usually have any significant vegetation growing off of them and they are relatively intact. Even if there is some revegetation, the Collawash is simply too wet and geologically unstable to leave intact roads on the landscape. We

encourage you use passive decommissioning very rarely, if at all, and use this opportunity to actively treat roads that need treatment.

Also as mentioned above, we are concerned that roads will be passively decommissioned not because they are already returning to a natural state or because it is the best choice for watershed health but because of pressure to keep the roads for anticipated future timber sales. If a logging project is reasonably foreseeable enough to make decommissioning prescription choices based on then it is reasonably foreseeable enough to do a cumulative effects analysis on.

We urge you not to put roads into storage for future timber sales. Such an action would fly in the face of the purpose and need of this project, the congressional intent behind the Legacy Roads and Trails Initiative, and could result in MHNH seeing a reduction in Legacy roads allocations in the future. The solutions to our road problems are intended to be permanent.

Thank you for including treatment factors and some ideas about future monitoring. We are glad Contract Administrators will monitor compliance, but we urge you to have a fish or wildlife biologist out in the field with contractors at most, if not all times, in order to insure that the work of decommissioning roads does not have any unnecessary and harmful impacts to any resources. We have heard reports of contractors sloppily dumping sediment into streams or decommissioning roads using unanticipated methods so we also encourage you to create highly specific contracts that allow for a high level of agency involvement in implementation. We also encourage you to work with stakeholder groups to involve volunteers in ongoing effectiveness monitoring. This will help develop support for the project in the community as well as assist in reducing costs of monitoring. In

general, we believe that public and volunteer involvement could be an excellent way to increase buy in on this project and keep costs down.

We save our comments on road to trail conversions for the recreation section of these comments.

IV. Adaptive Management

It is very challenging to comment on this section without the inclusion of the treatment strategy currently considered appropriate based on initial field visits. Please include this information in the EA.

V. Management Direction

MHNF is operating on a 20 year old Forest Plan that was created in the peak of the timber harvesting era. A new Forest Plan is sorely needed and anticipated: forests are directed to create new Forest Plans every 15 years at the latest. MHNF staff should already be thinking about how a new plan can improve the management of our Forest. However, a new Plan would change the management direction of the entire forest, potentially rendering this decision obsolete. This is one of the many reasons we urge you to promptly and properly implement this road decommissioning plan.

The section on ESA compliance seems cursory, and does not even mention the bull trout reintroduction. Please flesh out this section.

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 ("CWA") in its CWA analysis for this

PA. *Northwest Environmental Defense Center v. Brown*, 2010 WL 3222105 (9th Cir. Aug. 17, 2010). This is an extremely serious issue and MHNH needs to take prompt action to ensure that roads in this, and every other portion of the Forest, are not functioning as point sources. If they are, then MHNH must obtain appropriate permits for discharging pollutants (sediment) into a water body of the United States. Failure to take such action could result in legal consequences.

VI. Issues

During the comment period you received hundreds of letters from the public, yet only three issues were selected. Commentators made numerous points that are not even addressed anywhere in this PA. Bark collected 82 postcards that asked for a timeline on action, yet this was ignored. These postcards also voiced support for ambitious road decommissioning in general. Other groups also collected postcards in support of this project. Bark's organizational comments asked for analysis of climate change and how this project would prepare this watershed to deal with anticipated severe winter storm events. Oregon Wild also raised the need for climate analysis and asked for information on the road maintenance backlog. This was ignored. Comments from Pacific Rivers Council asking for analysis of how current conditions compare to desired conditions on all project area road miles were ignored. Comments from Trail Keepers of Oregon ("TKO") were dismissed and the recreation concerns of Bark were also ignored.

Strangely concerns related to hunting, vegetation management, and effects to BPA's powerline were not only heard and acknowledged, but developed into alternatives. We simply do not understand why the concerns of those groups are elevated above the concerns of all other stakeholders and find

this action to be disheartening. Why has the agency chosen to ignore the voices of the majority of commentators, people who have come out in strong support of this project?

A list of favorite hunting access points should not be enough for the Forest Service to disregard the urgent need for restoration in favor of access for a small group of hunters on all of those roads. These roads are often gated or inaccessible due to lack of maintenance anyway. It is unfair to place the burden of maintaining these roads for so few people on the public at large. Road decommissioning projects are always going to impact the ability of people to drive everywhere they are used to driving in the Forest, but the reality remains that hunters still have thousands of miles of roads they can drive on to access good hunting opportunities. Those that are able also have the option of walking. We sincerely hope that you do not simply exclude every road enjoyed by hunters from your decision.

Potential effects to vegetation management also receive too much weight in this analysis. Thinning is a new prescription for old plantations, and it remains unknown whether this practice will continue into the indefinite future. Furthermore, it is entirely possible that a fire could consume all the plantations in the next couple of years. It is prudent to keep all roads included in Alternative 2 in this analysis even if timber sale planners may anticipate using them in the future. A major blow-out could render one of these roads unusable and then at least you would have completed NEPA for decommissioning it. Also, the relative anticipated "value" of the thinning may not stack up when compared to the value achieved by decommissioning roads. Please keep roads identified as potential access points to future thinning projects in the project.

Finally, the need for BPA to access its powerline should not result in MHNH keeping open every single access point to the line. Multiple entry points exist to the powerline in many areas. MHNH staff should work closely with BPA staff on both mapping and field checking access points to ensure that access needs are met while simultaneously decommissioning as many of these duplicative access roads as possible.

VII. Alternatives

a. Alternatives Considered but Eliminated from Detailed Study

Once again we wish to reiterate that MHNH failed to take an excellent opportunity to partner with respected stakeholders in the hiking community by choosing to dismiss all of the well reasoned suggestions provided from hikers. Funding from the Legacy Roads and Trails Initiative can most certainly be used to achieve and maintain some of this trail work. These improvements are suggested by individuals and groups intimately familiar with the area and its needs, yet their opinions are quite rudely dismissed. We urge you to attempt to undo the damage caused and add at least a few of these suggestions to the project. On pg. 16 of the PA the agency response was that it could not ascertain the intent of a comment so assumptions were made about what the commentator meant. Where such confusion exists, why was the comment writer not contacted for clarification and further conversation? A call in this type of circumstance would reflect respect for the time and effort of the comment writers.

In that same paragraph you make the statement the "Forest is not looking to expand trail mileage on the forest unless there is a compelling need, an outstanding destination, and available and reliable volunteers to help share

in the trail maintenance for the project.” However, looking at the comment in context of the comment writer’s ongoing commitment to providing the agency with volunteer trail maintenance, the outstanding destination described, and an obvious need for more trails in the area it appears that the policy the Forest articulates is not being followed.

Hiking and biking opportunities in the project area but outside the Wilderness area are sorely lacking. With several campgrounds and many dispersed camp sites MHNH should absolutely be looking into adding additional trails in this area. Perhaps the reason the Rho Ridge trail is not used is not because people are not interested in hiking in the area but rather they do not know about the trail, are not accustomed to hiking in the area, are worried about getting lost, or don’t know how to find the trailhead. The recent Mt. Hood OHV Plan decision removed the Rho Ridge trail from consideration as an off-highway vehicle destination, another reason it may not have been a hiking destination in the past. These issues deserve further exploration and we look forward to seeing more on this in the EA.

b. Alternatives Considered in Detail

i. Alternative 2

We are pleased that in Alternative 2 you responded to public enthusiasm around road decommissioning and wisely added 30 miles to the original scoping proposal. Alternative 2 reflects the reality that now is the time to get rid of the crumbling unneeded roads that are draining resources and harming the ecosystem. We urge you to select this alternative.

i. Alternatives 3 and 4

As mentioned above, we are disappointed that you adopted an alternative, Alternative 3, that does everything the few folks with hunting, vegetation management, and powerline access needs suggested. We are also disappointed by Alternative 4, which obviously still heavily favors the desires of those commentators. We urge you to stick with the sensible course of action, count on the support of the people who strongly support this work, and select Alternative 2.

On another note, we do not support the use of funding from logging projects to complete road decommissioning work. PA at 18. As mentioned in this paragraph, the economy has significantly impacted the ability to sell thinning projects and logging has been delayed in many projects around the forest. Thinning sales are not as reliable a source of funding as indicated, especially since they could be halted by appeals and litigation. This course of action unfairly couples increasingly controversial large scale thinning projects with necessary road decommissioning. We urge you to be ambitious in seeking out Legacy Roads and other non-timber related sources of funding in order to pay for this critical work.

VIII. Project Design Criteria (PDCs)

a. Fisheries

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. Contracts should be written to give as much authority as possible to agency experts in these situations.

b. Recreation

Signs informing the public of impending road decommissioning should specify that the road is being decommissioned for restoration of habitat. Simply noting that the road is being closed and listing a place to call constitutes a failure to take advantage of an excellent opportunity to educate the recreating public. The public will not understand why they can no longer drive where they used to and they will not appreciate the importance of the work. Please use this road decommissioning as a an opportunity to let people know what is happening in their forest.

Affected Environment and Environmental Consequences

IX. Geology

We appreciate the thoroughness of the geology section of this analysis. This section really helps to illustrate the urgency of decommissioning as many miles of roads as possible in this highly unstable watershed and provides excellent justification for selecting Alternative 2 in the final decision. "In general, the more miles of road that are properly decommissioned, the greater the beneficial effects to water quality and fish habitat." PA at 29. Given this statement, the appropriate alternative to achieve the necessary objectives is obvious.

The PA notes that the "thinning projects would result in a temporary reduction in the tree canopy, which would slightly increase peak stream flows in the project area. Stream channels would be protected with buffers that would mitigate against increases in channel bank instability. The longer-term effect would be an increase in slope stability and water quality." PA at 31, *emphasis added*. Mt. Hood's LRMP asserts that canopy cover is the most

important factor in slowing reactivation of earthflows. An amendment to the LRMP suggest that wider spacing of trees is important to root and rootlet growth in plantations and increased transevaporation is more important to slowing the infiltration of water below the top soil layers and therefore “stabilizing” slopes in earthflows. Is canopy cover is no longer the most important factor? How can thinning projects which result in peak stream flows be justified in such an unstable area?

X. Hydrology

“[U]ntil a road is removed and natural drainage patterns are restored, the road will likely continue to affect the routing of water through watersheds.” PA at 33. “The sediment contribution to streams from roads is often much greater than that from all other road management activities combined, including log skidding and yarding.” PA at 34. Because funding is now available and the need is clear, we again encourage active decommissioning on as many miles of roads as possible. This section of the PA, perhaps more than any other, illustrates the importance of this project and should be shared with those skeptical of this work.

The hydrology section would have been an excellent place to discuss anticipated impacts from climate change. The Oregon Climate Change Research Institute just released an extensive report, available at <http://occri.net/ocar>, which discusses significant changes in our rain patterns. The consensus is that we can expect larger storms and longer periods of drought. The landslide risk in the Collawash is incredibly high already. Climate change will have significant impacts for both the road network and the hydrological functions of the Collawash and points to the need for the active decommissioning of as many miles of roads as possible. Please make sure to add more climate change analysis to the EA.

One thing we would like to point out is that this and other roads EAs rely on an assumption that surface water is the only force with potential to degrade the road prism. In earthflow areas such as the Collawash the situation is different. It is conceivable that entire road prisms, and all the aggregate and pollutants they contain, will fail and slide. A good example of this phenomenon is the 6300 road, which unexpectedly failed in 2009 after it had just received resurfacing and patches. Its culverts and crossdrains were reportedly functioning fine prior to the blowout. Could a similar situation occur on passively decommissioned roads? This possibility should be considered in your analysis, and again it leads to the conclusion that you should select Alternative 2 and actively decommission as many miles of roads as possible, especially in hot spots, to avoid catastrophic blow outs.

The fact that most culverts in the project area are 30 years old and are approaching their expected design life is significant. PA at 48. Widespread culvert failure in the project area would cause significant harm to aquatic habitat and be expensive to fix, but is avoidable if prompt action to actively decommission roads is taken.

Again, the fact that the CWA section does not discuss the new considerations that have arisen out of *NEDC v. Brown* is surprising. PA at 50. Also see *Northwest Environmental Defense Center v. Brown*, 2010 WL 3222105 (9th Cir. Aug. 17, 2010). Forest roads are potential point sources which require permits. Failure to obtain permits for point sources is a very serious issue.

XI. Fisheries

The PA does not mention the bull trout reintroduction project or discuss the needs of this species. Please make sure to discuss bull trout in the EA. This is a project many people have a lot of enthusiasm around.

A fish biologist should be on site during road decommissioning work that impacts fish bearing streams, especially streams containing listed or sensitive species. Please make sure that contracts for the implementation of this project allow for adequate on site input from Forest Service experts.

XII. Wildlife

In the PA you note that northern spotted owls (“NSO”) could be harmed by road decommissioning because of increased fire response time. This assumes that the response to fires in this area will always be suppression, which was not the case this past summer, when the fires in the Bull of the Woods Wilderness were allowed to burn. Any assumptions about the use of roads for fire management activities are largely really just speculations. We wonder, are there any possible benefits to NSO and their habitat from road decommissioning? Are there any management activities facilitated by the extensive road network that would do harm to NSOs if left intact? You mention short term NSO hunting opportunities on recently seeded decommissioned road beds. Yet there is no discussion of whether NSO benefit from having more contiguous, unroaded habitat. Please explain how NSO might respond to decreased road density in the EA.

The PA mentions that Alternative 2 would decommission the entire road which is used to access a peregrine falcon nest site, reducing the risk of harassment but also making it hard to monitor. PA at 74. We support active decommissioning of this road, but the decommissioning prescription should allow for foot access by wildlife biologists and other experts while simultaneously reducing the risk of harassment due to access by recreationists. We support the timing restriction on decommissioning work

and encourage a high degree of protection at these sites. A wildlife biologist should be on site, if possible, when any work in proximity to the peregrine nests or any other nests or sensitive areas takes place.

Road density in the Collawash is quite high. "High road densities lead to harassment of elk herds." PA at 80. Perhaps this information could be used to help some of the hunters who are concerned about this project understand why it is so important? We appreciate your road density analysis. PA at 82. Also, in discussing wildfire's impacts on wildlife, why was there no consideration of large fires helping to create new forage opportunities? PA at 83. The resumption of natural fire regimes could help improve habitat in the long run. Will biologists be monitoring the new habitat created by this past summer's fires in the Bull of the Woods?

XIII. Botany

We recommend that manual and mechanical treatment of invasive species be included in road decommissioning contracts.

XIV. Vegetation

As mentioned in the summary of our main points above, the role of vegetation management, specifically future thinning projects, in controlling the outcome of this project is one of our main concerns about this project. Numerous sections of this PA; such as the geology, hydrology, and transportation sections, make it clear that the need for large scale road decommissioning in the Collawash is urgent. Yet the vegetation section seems to, pardon the pun, not see the forest for the trees. It disregards the larger concerns of the health of vegetation in the watershed as a whole and

focus exclusively on the perceived loss of future commercial thinning opportunities.

The PA says that “there is sufficient value in a sustainable restoration thinning program in the project area to cover the cost of maintaining roads to a standard that provides safe access and protects resources.” PA at 93. However, the data provided does not suggest this at all. Rather what it suggests is that for a couple decades this area produced massive amounts of timber, and that the harvest has remained at consistently (relatively) low levels ever since then. *Id.* The Collawash has produced thousands of board feet of timber. There are three proposals with multiple timber sales included in the Collawash area right now, but the problem of finding funding for road maintenance persists. 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 as mentioned on page 95 of the PA. Nothing indicates this could be the case. It is hard enough to find buyers for some of these thinning projects. Furthermore, timber sale dollars are not the funds used when these roads blow out and emergency repairs are needed.

Thinning opportunities for the next ten years were reviewed and incorporated into the analysis of road decommissioning. The beliefs regarding revenue from timber sales paying for road maintenance fail to take a look at the big picture here. The truth is that the National Forest system as a whole is shifting away from timber production and towards management for clean water, habitat, and recreation. The unsustainable peak of logging is in the past. Thinning projects won't generate the kind of revenue that old growth clear cuts once provided. It is not reasonable to assert they are going to pay for the maintenance this geologically unstable road network as the role of thinning in Mt. Hood's future remains unknown.

But we do know we are continuing to get appropriations for the Legacy Roads and Trails Initiative. And we have a unique opportunity in this road decommissioning project now. We encourage you to select Alternative 2 and make road decommissioning decisions based on known environmental needs rather than speculative future thinning plans.

Thinning is not the only answer to complex forest management decisions. We encourage you to closely monitor the recovery of forests in the Bull of the Woods to gain a better understanding of a more natural way for forests to return to a healthy state.

This section of the PA also repeatedly mentions jobs as a justification for thinning. However, no where does the PA look at how many jobs could be created through this project. The implementation of active road decommissioning in this area provides an excellent opportunity for job creation which should be considered. Does Mt. Hood have statistics on how many jobs road decommissioning projects create? National estimates indicate that 23 jobs are created for every million dollars spent on road decommissioning. It is clear that thinning is not the only way for the forest to provide local communities with a livelihood.

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. At this point they are reasonably foreseeable cumulative impacts. 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.

XV. Recreation

The recreation section of the PA starts by stating that driving for pleasure is a primary use of the forest. According to the NVUM, only 2.8% of forest users said that driving for pleasure was their main activity in the forest. We suspect that many of the Forest's recreationists see their time driving as just that, driving time, and see their time outside of their cars as their recreation time. Driving for pleasure may have once been a major activity on Mt. Hood, but data now shows that the vast majority of forest users are actually there to get out of their cars and engage in hiking, skiing, camping, or other activities. Pleasure driving, without destinations where people can participate in other popular activities, should not provide a justification for keeping any roads open.

It is strange that the main recreational attraction of this area, Bagby Hot Springs, is not even mentioned in this PA. Bagby is an incredibly loved and popular area and for many it is their first introduction to MHNH. Driving to Bagby is a notoriously confusing pursuit for those unfamiliar with this section of MHNH and people regularly get lost or turned around in this area. The benefits of making access to the few main recreation sites easier through the reduction of the road system should be mentioned in the EA. The number of people who avoid these remote recreation destinations for fear of getting lost in the vast and confusing network should not be underestimated.

The concerns of snowmobilers about access to the Graham Pass area should not be used to justify keeping roads open. Mt. Hood has not engaged in comprehensive planning for over snow vehicles (OSVs) as mandated by the

Travel Management Rule. We encourage the MHNH to take on this planning process promptly. By not undertaking this planning process, Mt. Hood National Forest:

- will continue to allow resource damage from unanalyzed and unregulated OSV use, including negative impacts on wildlife and on vegetation in low-snow areas;
- will fail to prevent user conflicts between OSV use and quiet, non-motorized recreational users of the forests to persist indefinitely;
- 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;
- does not meet either the spirit or letter of Executive Orders 11644 and 11989; and

As mentioned in our summary of key concerns, it is absurd that the interests of hunters seem to take on enormous proportions in this analysis, despite the fact that hiking and other forms of recreation, according to the Forest Service’s data, are far more popular activities on MHNH. Outside of the wilderness area, there are very few trails in this portion of the Forest. Users of the many nearby campgrounds have limited recreation options. For this reason, Bark and others have encouraged MHNH to seize upon opportunities for road to trail conversions. Many trails are old roads, and they continue to be popular with quiet recreationists despite this fact. This is true about all the trails listed on page 99. The continuing growth of the population in the area makes this an ongoing issue. Many trails are crowded on weekends, decreasing the quality of the recreation experience for seekers of solitude. Recreationists who seek solitude are continually seeking new, less crowded areas to hike, bike, bird watch, etc., and they are willing to drive to remote

locations and travel along longer trails in order to escape the crowds. This area would be a perfect place to site trails for them.

The statement that “[j]ust as the Forest is interested in reducing its road mileage, it should also avoid adding more trail mileage without a compelling demonstrated need,” is a broad statement of policy, but it does not contain any citation indicating its source. PA at 99. Is this the Forest’s policy? When was this policy decided upon and what was the process? How are terms such as “compelling” defined? Roads have serious ecological consequences: nothing in this analysis indicates that trails have anywhere near a similar impact. In addition, the forest does not have a history of using volunteer labor to maintain forest roads, but it does have a proud history of volunteerism on trails. Instead of foregoing an excellent opportunity to create some new trails, MHNH should be seeking to strengthen partnerships with recreation groups in order to get more volunteers involved in creating and maintaining trails.

Other forests have had to make tough choices and decommission roads which lead to major recreation destinations. It is possible that Mt. Hood may some day make similar choices. At the very least, many recreationists will be a little peeved when they discover they can no longer access dispersed camp sites. Reaching out to a broad array of organized recreation groups and providing signage at visible locations should be a high priority for MHNH. Educating this community on the benefits of road decommissioning and making it clear that their input is important is a crucial way to get buy in and prevent backlash from this community when tough choices are made. We urge you to reach out to the recreation community and work collaboratively with them prior to publishing an EA.

Finally, we understand that road to trail conversions may not always be a good idea, but it is hard to believe that there is not a single place in 255 miles of roads where this could work, other than the one ½ mile of road into wilderness that will be converted into a trail. The road to trail conversion on Salmon River Road, leading to Salmon Butte, is an excellent example of MHNH taking an old road and creating a trail which is aesthetically pleasing for hikers while still achieving restoration goals. We ask for you to 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. Specifically we ask that you convert the 6311 road to a trail. A trail here would be utilized by bikers with Cycle Wild, a group dedicated to helping bikers access camping opportunities in the forest. We also ask that you reconsider all of the road to trail conversions requested by Trailkeepers of Oregon. Funding from the Legacy Roads and Trails initiative can and should be used to achieve trail work and not just road work.

Alternative 2 remains the best choice for MHNH. The decommissioning of roads, especially roads adjacent to wilderness, is an important step at helping people achieve the experiences that lead them to this remote portion of the forest in the first place.

XVI. Transportation

We sincerely appreciate the inclusion of estimated costs of road maintenance and road decommissioning. PA at 118. We also appreciate you breaking down the total annual costs to maintain roads by alternative. PA at 120. This information is incredibly helpful and we hope it can help people who might not otherwise support this project understand how practical it truly is. Can you also include deferred maintenance costs in the EA?

We are also please to see that MHNH received an influx of ARRA funds, but are a little curious about why MHNH received so little funding from the Legacy Roads program. Can you explain?

We appreciate your explanation of how you make decisions on whether to passively or actively decommission roads. We understand that finding adequate funding for active road decommissioning and priorities must be set on an annual basis. However, as mentioned in the summary of our main concerns, we simply have not come across roads in the Collawash where significant vegetation is growing out of the road bed and natural drainage patterns are functioning at a high level as seen on page 114. In surveying hundreds of miles of roads we have seen only a handful of trees growing out of a road bed. Based on your description on when passive decommissioning is appropriate and our experiences in the field, we imagine that this treatment type will be very rarely used. Please provide us with an estimated breakdown of anticipated decommissioning treatments in the EA.

We also appreciate you listing the different kinds of road decommissioning. It helps illustrate the complexity of the issues. We encourage you to include the different types of road to trail conversions in this list as well. As road decommissioning is implemented, we encourage you to design contracts that allow an on site Forest Service staff person to have a high degree of input in order to ensure that the appropriate prescription is selected for each road. We have also come across road decommissioning projects in other districts where inadequate seed and mulch is used and urge you to work to ensure this is not the case in the Collawash.

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 something like 1) decommission immediately upon receiving funding, 2) decommission soon, and 3) 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.

On another note, we are deeply concerned that if too many roads are passively decommissioned, MHNH will have 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 specialize machinery. We would be happy to assist in these endeavors in whatever ways possible.

The EA should 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. One of the great benefits of decommissioning a portion of MHNH's vast road network should be reducing the burden on law enforcement because there will be fewer roads to patrol. Managing and attempting to curtail activities such as illegal OHV trail building and use, illegal dumping, manufacture of controlled substances, and car stripping on unneeded roads is a costly endeavor. This positive impact of the project should be included in the EA. We do 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. Projections on long term savings would be a good start.

Seasonal road closures will not meet the purpose and intent of this project. This is the best opportunity we've had in a long time to set the road system on course to a sustainable density and seasonal road closures aren't going to accomplish that job. Seasonal closures require maintenance funds indefinitely and remain prone to erosion in future storms. Pulling culverts, storm proofing, decompacting road surfaces and replanting will truly restore these roads and result in a sustainable road system. Seasonal closures are often ineffective as OHV users regularly vandalize and destroy gates. We support full decommissioning of the current proposed roads at a minimum without the use of seasonal road closures.

Finally, we were not previously aware that “the same road under each alternative may have a different treatment associated with it.” PA at 119. Please include a description of planned treatment in the EA.

Site Specific Concerns

We sincerely appreciate the inclusion of some longer road segments into this proposed action. The inclusion of these roads allows for significant benefits for wildlife, fish, and the reducing the cost of the road system. We recognize that these longer roads present favored access points for both agency staff and members of the public and that making a decision to decommission these roads is much more difficult than electing to decommission short spur roads. Thank you for being open to making the right choices.

Decommissioning the following roads in particular will have significant benefits for fish and wildlife habitat and we strongly encourage you to move forward with decommissioning these roads.

Road 6310: A number of the spur roads proposed for decommissioning in this area provide access to power lines. In the EA the Forest Service should disclose specific considerations regarding road closures in power line corridors.

Road 6310015: This road is not currently proposed for decommissioning and now needs to be properly decommissioned. Thank you for including it. As it was not on the earlier map. The “road” above the one culvert here is collapsing into the surrounding wetland.

Road 6310170: This road is not in the current PA even though it was in the scoping. Why was it excluded in the consideration? This road contains 24 culverts, mostly for ditch relief. Most of these culverts are in poor condition,

either plugged or buried, creating problems for nearby aquatic resources. In addition, evidence of grouse, coyote, deer, elk, and black bear have all been observed here, indicating this is important habitat and immediate decommissioning is appropriate. It needs to be decommissioned.

Road 6310180: This road is not currently proposed for decommissioning but should be considered, as it is a long spur that leads to power lines which could be accessed from other points. In addition, it should be considered for conversion to a trail, as it provides scenic views of the area. No compelling need to access the Line Runner Pit has been demonstrated.

Road 6310185: This road is not included in this project, but should be. It has been damaged by ATV use, but includes a good diversity of trees and is heavily utilized by deer and elk. The four culverts on this road are in need of repair or removal.

Road 6330013: This road has not been included in this project but should be considered for decommissioning because of evidence of erosion and sagging.

Road 6340170: This road should be considered for immediate decommissioning even though it is part of the Hot sale because its geologic instability is leading to erosion and several of the culverts are functioning improperly.

Road 6340230: This road was proposed for decommissioning with delay in scoping but was removed. Why? It decommissioned because of erosion. Also a stream is running along the roadway.

Road 6370: Decommissioning this road is one of the most exciting aspects of this proposed project. The removal of this road from the system will create an important wildlife corridor extending beyond the Bull of the Woods Wilderness area near Round Lake. The portion of the road north of Round Lake should absolutely be decommissioned as it creates significant confusion, but there are excellent reasons to decommission the southern portion as well. Decommissioning this road would also reduce road density in areas with significant landslide risk. The removal of this road would reduce disturbance in an area that stretches from higher elevation to lower elevation which will be important for wildlife as they adapt to shifting habitat in a changing climate. Seasonal road closure is inappropriate here as it would only benefit wildlife during certain times of the year. In order to mitigate the impacts of climate change we will need to restore and improve wildlife habitat options year round, not just during certain months. This road also bisects designated critical habitat for the Northern Spotted Owl. Removing this road will assist in the recovery of NSO in this area as reduced road density and disturbance from vehicles would improve nesting and foraging habitat.

Road 6311 and 6321: Removing these roads would provide important habitat for wildlife at lower elevations that have winter range for deer and elk. Mt. Hood National Forest lacks unroaded and undisturbed habitat for deer and elk within their winter range. Lowering road density increases the chances of successful calving, thus creating habitat that is suitable for calving in this range is important. A seasonal road closure here would circumvent the stated purpose and need of the project because it would only benefit wildlife during certain times of the year. In order to mitigate the impacts of climate change and improve terrestrial habitat utilization, the Forest Service must restore and improve wildlife habitat year round. In

addition, numerous culverts on the 6311 have been found in serious disrepair.

We also ask that you implement a road to trail conversion for the 6311 road. This road could provide excellent opportunities for bikers. This proposal is supported by Cycle Wild.

Road 6311130: Thank you for including this road, which was not included in scoping, for decommissioning. This road, which contains two culverts, is in poor repair, and is eroding into nearby Sluice Creek.

Road 6311140: Thank you for including this road, which was not included in scoping, for decommissioning. This road, which contains six culverts, is extremely close to numerous streams and is in a wetland, causing significant aquatic damage. In addition, a portion of the road has a large fault in the middle. There is ample evidence of ducks, beavers, salamanders, frogs, and elk in the area. As a result of two entirely blocked culverts (one by beaver, one by plant material, two large stagnant ponds have formed off this road).

Road 6311150: This road has been proposed for decommissioning with delay, but should be promptly decommissioned. It cuts through diverse wetlands, with skunk cabbage visible yards away from the road. In addition, the old growth cedars off this road should be protected from future disturbance.

Road 6311160: Thank you for including this road, which was not included in scoping, for decommissioning. It is in serious disrepair, and travels through wetlands and old growth forest. Elk and numerous frog species including Oregon spotted frog have been spotted on this road. Of the five culverts on

this road, one is plugged and almost entirely buried and another is blocking fish passage. An area creek has diverted to create several channels across this road, and erosion is evident. This road is causing significant damage to aquatic resources and should be decommissioned.

Road 6311170: This road should be decommissioned promptly because it is causing significant harm to aquatic resources. This road cuts across a wetland and is having significant impacts on the hydrology of this area.

Road 6311180: No action was proposed for this road, but it should be considered for decommissioning. This road travels through wetlands, riparian zones, botanically rich meadows, and old growth. There are seven culverts here, and at least one of them is significantly too small for the large stream which flows through it. A portion of this road has been obliterated and replanted, and there is no reason that the rest of the road should be kept in the system.

Road 6330 and 6341: These two roads are perhaps the most important to restore in the whole project given the benefit of increased undisturbed area this would create. Currently these roads bisect the habitat between the Hot Springs Fork and the Bull of the Woods Wilderness. Removing the 6330 and 6341 will open up significant opportunities for deer, elk and other species that are negatively affected by roads. These roads are also at risk of landslides, so reducing roads in this area will reduce erosion for future earthflows. Reducing disturbance in an area that stretches from higher elevation to lower elevation is important for wildlife as they adapt to shifting habitat in a changing climate. A seasonal road closure here is unlikely to be successful and would only benefit wildlife during certain times of the year, thus failing to meet the stated need to allow wildlife species to utilize more

contiguous habitats. 6330 also bisects some designated critical habitat for the Northern Spotted Owl in its upper reaches and 6341 enters deep into the critical habitat unit. Reducing the road density in NSO critical habitat will improve nesting and foraging habitat by reducing disturbances from vehicles.

Roads 7040 and 7030: Restoring these roads would go a long way toward restoring the Nohorn Creek watershed and provide a valuable wildlife corridor heading downstream from the Opal Creek Wilderness. This would reduce disturbance in an area that stretches from higher elevation to lower elevation which will be important for wildlife as they adapt to shifting habitats in a changing climate. A seasonal road closure here is inappropriate for the same reasons discussed above. These roads also enter deep into designated critical habitat for the Northern Spotted Owl and reducing the road density would improve nesting and foraging habitat by reducing disturbances from vehicles. 16

Road 7021: Due to the location of this road it is a prime candidate for decommissioning. 7021 is located directly adjacent to Bull of the Woods Wilderness and intact/undisturbed wildlife habitat. Decommissioning this road would increase terrestrial habitat within this late successional reserve. A seasonal road closure here is inappropriate here for the same reasons discussed above. This road also enters deep into designated critical habitat for the Northern Spotted Owl. Reducing the road density would improve nesting and foraging habitat by reducing disturbances from vehicles within critical habitat.

Road 4640: This road is in an area of extremely high road density. Decommissioning this road would be particularly beneficial in reducing the

road density within close proximity to the Clackamas River. Road 4640 and associated spurs also enter into important winter range for deer and elk. A seasonal road closure here is inappropriate for the reasons discussed above. Furthermore this road passes through areas of concern for landslide (earthflows). Reducing road density in this earthflow area will reduce the chance that landslides off the 4640 could adversely impact water quality. This road also enters designated critical habitat for the Northern Spotted Owl. Reducing the road density would improve nesting and foraging habitat by reducing disturbances from vehicles within critical habitat, and be consistent with the agencies obligations under the Endangered Species Act.

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,

A handwritten signature in cursive script that reads "Lori Ann Burd".

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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

