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April 14, 2008

Michelle Lombardo  
Mt. Hood National Forest  
Aquatic Restoration Team Leader  
16400 Champion Way  
Sandy, OR 97055

Re: Forest-wide Aquatic Restoration Scoping Letter

Dear Michelle,

Bark has been actively engaging citizens on issues around Mt. Hood National Forest for over ten years. We have worked with the agency through many of the changes in public lands management in this past decade. Recently, Mt. Hood National Forest has been putting a renewed priority on forest-wide restoration efforts. Bark's longstanding concerns about the crumbling roads system inherited from intensive logging in the past have become a top focus in discussions about effective restoration. Bark commends the Forest Service for taking these first steps toward finding solutions for protecting our forests from the largest threat facing Pacific Northwest ecosystems. We look forward to working with the Forest Service in new and innovative ways.

Bark's involvement with the collaborative stewardship process has given us an increased understanding to some of the funding challenges for restoration in our national forest. Bark has been a participant of the Clackamas Stewardship Partners (CSP) since its inception four years ago. This successful collaborative group has been nationally recognized for its productive focus on issues in the Clackamas District. Last year, stewardship funds were used on restoration projects throughout the District thanks to the collaborative efforts of the CSP. On a recent field trip, we were able to see the results of this money in a successful side channel project along the Clackamas River. Once prime spawning habitat for coho salmon, this channel within view of Highway 224, has been reopened and native vegetation restored along the banks. We look forward to watching the continuing transition of this channel as natural processes facilitate a thriving new habitat, as well as seeing this success throughout the national forest.

**BALANCING RESTORATION AND RECREATION**

As the Forest Service is well aware, the challenge of balancing forest management with the growing need for recreation opportunities and access adds a complexity to the

prioritization of where to begin when considering future restoration projects. Mt. Hood National Forest receives over five million visits annually. Bark is glad to see recreation concerns and access mentioned in the scoping letter. The growing use of the National Forest roads and trails system increases the need to include user impacts in the assessments of each action, both user-caused and user-affected impacts. We know the Forest Service is committed to finding solutions to the rise of off-highway vehicle (OHV) use in Mt. Hood National Forest, though the OHV Travel Rule and we hope to continue finding new incentive for the Forest Service to broaden the scope of this planning process to include other uses of our roads system.

For the past year, Bark has focused on facilitating the Restore Mt. Hood Coalition, a group of recreation and conservation organizations committed to finding long-term solutions to address the road maintenance backlog. The Forest Service does not agree that the Travel Management Rule is an appropriate place for assessing a plan to reach the recommendations in the 2003 Roads Analysis. However, Bark and the Restore Mt. Hood Coalition has considerable concerns about including road decommissioning and closure work in the current restoration EAs for the following reason.

The Clackamas River side channel project mentioned above offers an excellent example of where Bark separates types of restoration work. This side channel, with money and resources, could be created with a one-time project plan. With various mitigation measures, the design of these projects can anticipate natural disturbances that might have an impact on the success of the project in the future. Aside from this consideration, ecosystem restoration that includes encouraging the return of native diversity has the important distinction of immediate natural capital investment. The project does not result in a need for maintenance or continued funding sources for its goals to be met.

In comparison, decommissioning or closing a road has proven to have many long term maintenance needs potentially associated with an initial project; ineffective closures needing to be reinforced, OHV passage continuing to propagate nonnative species that might otherwise have a likely chance of dying back with the return of a canopy coverage over the road, sediment management from existing fillslope deterioration, culvert failure and the many stream quality issues associated, to mention a few. Even with full road remediation, the potential interruptions to recreation access may create further projects in order to analyze the effects of fulfilling the needs of various user-groups. These considerations warrant a very different and more comprehensive impact analysis than what is considered for a one-time entry ecosystem restoration project such as a side channel.

## **WE NEED A PLAN**

*Road Decommissioning for Aquatic Restoration*  
*Aquatic Restoration Road Treatments*

These are two separate restoration projects currently in consideration and listed in the Schedule of Planned Actions on Mt. Hood National Forest. Project details aside, the

Orwellian titling of these proposals are either indicative or exemplary of Bark's major concerns with the current track of these efforts: We need a plan. More so, we need clarity on a plan. Not only do these names lack distinguishable wording, they also do not provide enough information about their location, scope or action.

*Bridge 1825 Replacement*

*Forest Road 1825 Road Repair*

These are two other restoration projects listed in the SOPA. Despite having the same status, timeline, contact person, location and purpose, they are listed as separate projects on separate pages. When Bark expresses concern for a piecemeal approach to restoration work, and our concerns for how this might be applied to the need for road removal, these are the examples we are referencing for that concern. Without clarity on how this work will be accomplished, where the funds will be applied next and, most importantly, how these efforts fit into the broader context of Mt. Hood National Forest, we question the efficacy of such projects. Although, we understand that there may be administrative reasons for these listings, we encourage the Forest Service to consider the impact it may be having on public involvement. For reference, these comments are responding to the recent restoration scoping letter and we will henceforth refer to this proposal as Forest-wide Aquatic Restoration.

The Forest-wide Aquatic Restoration EA process does not do enough to involve the public in determining needed projects, understanding the prioritization process, and other decision-making factors. In order to better communicate with the public, it is necessary for the Forest Service to have a long-term, holistic vision for aquatic restoration, road reclamation, and recreation access. By crafting a vision with public input, it would provide clarity in communication and help with commenting on how each project is integrated into a larger framework. As it stands now, it is difficult for the public to understand how all these separate processes fit together and what desired future condition these actions are moving forward.

As mentioned in the scoping letter, the Roads Analysis identifies the need for the Forest Service to determine opportunities for decommissioning and closures of forest roads with low user access needs and that pose adverse environmental impacts. The Roads Analysis is an important starting point, and a foundation for the Forest Service to build upon with the public. The Roads Analysis should be expanded upon to create a long-term, holistic vision for aquatic restoration, road reclamation, and recreation access. Building upon a vision, the Forest Service should create an integrated plan for dealing with these issues as mandated by the 2005 Travel Management Rule (TMR).

Currently, the Forest Service is engaging in multiple processes, including the OHV Travel Plan and multiple Restoration EAs. However, the TMR states that a comprehensive science-based determination of a minimum road system must be implemented in coordination with the motorized use designation process to assure the travel plan meets applicable Forest Plan's resource management objectives (including aquatic restoration). The Agency recognizes the proliferation of un-inventoried and unnecessary roads has damaging environmental implications. 70 Fed. Reg., at 68265.

While a sub-watershed may be an appropriate scale for aquatic restoration, it is not the best scale to address recreation needs and connectivity. As a result, the TMR recommends a forest-wide analysis to assess different resource and recreational needs. If the Forest Service were to follow the correct protocol, there would be a basis for roads-to-trails decisions and real opportunities for improving recreation infrastructure.

### **SPECIFIC CONCERNS ABOUT FOREST-WIDE AQUATIC RESTORATION**

If the Forest Service chooses to shirk its responsibility by not doing a comprehensive Travel Plan, at the very least, it should be including the recreation community in determining roads-to-trails decisions. Much the way the Forest Service allowed the OHV community to identify their favorite riding areas, the Forest Service should allow the non-motorized recreation community a chance to weigh in on recreation destinations and access *before* planning has begun.

This current proposal recommends 4-5 miles of roads be considered for conversion to recreational use. For a restoration project the recreation trails created should be for non-motorized use only. These roads-to-trails should not be part of any current or future amendments to the trails created through the OHV Travel Plan. In general, recreation opportunities should be assessed more holistically as outlined in the TMR.

There is no field-verified baseline road data to address ongoing impacts related to the use, misuse, or in some cases the mere existence of roads and trails across the forest. As referenced earlier, Mt. Hood National Forest receives over five million recreation visits annually. This is a significant number, and it is important that recreation access and improvements factor into road prioritization planning.

In the *Preliminary Issues* of the scoping letter, four groupings of recreation are identified; Forest Products (as in gathering, not timber harvest), Recreational, Hunting and Fishing. There are a number of uses of the forest missing from this list (mountain biking, skiing, birdwatching, to name a few) and the reasoning for these groupings are unclear. Additionally, we expect that environmental assessment will not only include the impacts that will be put on users' access, but also a consideration of the different forms of current recreation impacts on the ecosystems when determining the cumulative impacts of the project purpose and need.

Over the last year, Bark has worked with volunteers to inventory over 300 roads in Mt. Hood National Forest. One of our findings was that nearly half of the road closures had some signs of vandalism and vehicle use beyond the closure. In some cases, this illegal use enabled connections to a spidering system of user-created OHV trails. Maintaining ineffective closures and expecting passive decommissioning to work is not a good use of limiting funding and resources.

We understand that funding has left the agency doing what it can to solve certain road and restoration. In some cases, we understand that active decommissioning could cause increased harm to a slope or waterway. However, if a road has been deemed an

unnneeded threat to the ecosystem, than it should warrant effective closure. If insufficient funding or increased risks to the ecosystem are prohibitive factors to actively decommissioning a road, we expect road remediation and active decommissioning on the first 1/8 of a mile. This would include road surface removal, regrading, culvert removal and replanting, in order to fully discourage the continued use of the road.

In addition, we expect detailed descriptions of each culvert replacement, including information such as what the current conditions are, what the objective goals are for each replacement, the dimensions of the new culvert and any bank reinforcements that may need to be made for stream improvements and any information about fish presence in the affected streams.

In conclusion, while Bark is encouraged to see progress in the direction of effective restoration through road decommissioning, removal and maintenance, we do not agree with the process currently chosen to accomplish this work. We are prepared to work with the Forest Service through the Restore Mt. Hood Coalition to create, promote and implement an improved process, if not use the current opportunity of the Travel Management Rule.

We look forward to discussing this issue more. Please contact me if you have any questions.

Thank you,

Amy Harwood  
Program Director