

November 1, 2007

Jennie O'Connor
Mt. Hood National Forest Travel Plan Team Leader
6780 Highway 35
Parkdale, OR 97041

MHNF Travel Plan Team:

Please accept these comments from the Restore Mt. Hood Coalition (Coalition) in response to the proposed Mt. Hood National Forest Off-Highway Vehicle (OHV) Travel Management Plan (OHV Plan). The Coalition commends the Forest Service for recognizing the importance of controlling OHV abuse in Mt. Hood National Forest (MHNF) – all Americans have the right to enjoy our public forests, but no one has the right to destroy them or to ruin the experience of other forest visitors.

The Restore Mt. Hood Coalition represents recreation and conservation organizations committed to promoting and preserving Mt. Hood National Forest's world-class recreation opportunities and healthy ecosystems. We believe that a Mt. Hood Travel Plan should provide a framework for all users and not just OHV riders. Therefore, we respectfully request that the Forest Service expand the scope of the OHV Plan to simultaneously address the impacts of OHV use AND the crumbling road system on ecosystem health and quiet recreational opportunities. The result will be a stronger Mt. Hood recreational community, a more robust recreation infrastructure, improved relations with adjacent landowners and communities, and healthier ecosystems.

Travel plan regulations intent broad, Mt. Hood plan narrow

The nationally-mandated travel planning process is designed to create a framework for current and future travel infrastructure decisions. The regulations (36 CFR 212,251,261, and 295) clearly state that the Forest Service should address “*all* motorized travel” and identify the “minimum road system” necessary. *Emphasis added.* However, the purpose and need of the proposed OHV Plan addresses only two small parts of larger travel planning needs on Mt. Hood. The approach described in the Notice of Intent states that the “National Environmental Policy Act (NEPA) process will only address OHV use and motorized access to dispersed camping.” In order for the true intent of travel planning to be realized, the Forest Service must address off-road user needs simultaneously with the needs of quiet recreationists, other forest visitors, and the ecosystem impacts of the various modes and conditions of travel throughout the forest.

Multiple Forest Service documents raise concerns associated with the extensive road network within MHNF (~3,464 miles), including the need for greater road closures, decommissions, and maintenance. The 1999 Mt. Hood Access and Travel Management Plan (ATM) found that 49% of the classified road system is “...closed now or could be closed or decommissioned in the future” to mitigate the threat to fish and wildlife habitat and drinking watersheds. The Mt. Hood National Forest 2003 Roads Analysis states that “preliminary estimates indicate that the Forest Service is underfunded by more than 50% to maintain the current road network to full objective maintenance-level standards.” Despite the 1999 and 2003 analyses, there is limited information on the effectiveness of current road closures and decommissioning efforts. Bark, a

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Coalition member, conducted a forest-wide road inventory and found that out of 335 road segments surveyed, twenty-six percent, or eighty-seven road segments, had clear signs of OHV use despite being labeled “closed” by the Forest Service. Without the elimination of unneeded roads, the Forest Service has a limited ability to prevent roads listed as closed from being abused or further damaged.

Mt. Hood National Forest deserves a vision

The Coalition has adopted a vision for Mt. Hood National Forest that will successfully meet the intent of USFS travel management regulations as well as the needs of all stakeholders. Given the absence of a vision offered by the Forest Service to guide the OHV Plan and related travel management decisions, we encourage the Forest Service to adopt language similar to the following citizen-generated vision.

The Restore Mt. Hood Coalition envisions a future for Mt. Hood National Forest that balances long-term ecosystem health with diverse recreation opportunities by protecting the health and safety of different users and minimizing conflicts with adjacent landowners and communities.

In order to implement this vision, we propose the OHV and travel management plan include the following outcomes:

- The Coalition supports a travel planning process that designates OHV areas only where it is demonstrated that there will be adequate enforcement and minimal user conflicts.
- The Coalition supports a travel planning process that includes the evaluation of the year-round impacts of motorized travel on existing roads, trails, and areas with the goal of using this information for future recreation planning and management decisions.
- The Coalition supports a travel planning process that uses quantifiable standards to determine roads that should remain open or be improved, roads that should be closed through passive decommissioning, and roads that should be removed through active decommissioning.
- The Coalition supports a travel planning process that attains the minimum road system necessary to balance Forest Service administrative needs with recreational needs and long-term ecosystem health.

Overcoming obstacles

The Coalition believes that by working together with the Forest Service and other stakeholders that the current scope of travel planning can be expanded to implement a comprehensive, yet timely, Mt. Hood Travel Plan. Based on two meetings with Mt. Hood National Forest Supervisor, Gary Larsen, we understand that our vision echoes similar sentiments within the agency: nationally, as described in the 2001 Roads Rule and 2005 Travel Management Rule, and locally, as described in the 1999 ATM and 2003 Roads Analysis. However, Mr. Larsen has expressed to us his concern in accomplishing a more comprehensive Travel Plan due to the following four constraints:

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1. **Staff resources:** The Forest Service does not have the resources to do the NEPA analysis (i.e. write an environmental impact statement on removing, maintaining, or upgrading roads).
2. **Politics:** The Forest Service feels that the OHV proposal is already contentious enough and is concerned about the added controversy of road removal.
3. **Timing:** The Travel Plan must be completed by November 2009.
4. **Regional agency direction:** Internal direction is to focus on OHV planning and not open up travel planning to non-OHV needs.

Common sense solutions to real problems

The Coalition is committed to working with the Forest Service to circumvent these constraints and broaden the scope of the travel planning process to comply with both regulatory mandates and previous Forest Service recommendations for Mt. Hood roads. The Coalition suggests the following resources and solutions for working together on this process:

1. **Staff resources and funding:** In the last year, the Coalition has contributed over 2,000 hours of volunteer time inventorying the Mt. Hood road network. Data has been collected on road closures breached by OHVs, failing culverts, and recreation demands. Recognizing that information collected by non-professionals may not provide sufficient data for a comprehensive Travel Plan and Environmental Impact Statement (EIS), the Coalition has secured funding for consultation services to assist the agency's data collection and analysis. The Forest Service has an extensive history of working with multiple Portland-based consulting firms in the collection and analysis of data for a variety of NEPA processes. The Coalition encourages entering into a cost-share agreement with the Forest Service were it to expand the scope of the travel plan to address forest-wide travel needs while seeking opportunities for active and passive road decommissioning.
2. **Timing:** We believe that the following Forest Service documents serve as a model for expanding the scope of the planning process by providing baseline information and identifying existing data gaps: the 1990 Mt. Hood Land and Resource Management Plan, 1999 ATM, 2003 Roads Analysis, 2004 National Visitor Use Monitoring Project, 2007 Oregon State Comprehensive Outdoor Recreation Plan, various 5th field watershed analyses, and guiding regulations found at 36 CFR 212,251,261, and 295.

Federal contracting requirements allow for an abbreviated procedure when working with previously certified contractors. The Coalition would be supportive of utilizing such a process to identify a consultant in a timely manner and begin implementation as soon as possible. We believe that the combination of existing documentation and guidance, flexibility in federal contracting process, and willingness of the Coalition to work with the Forest Service facilitates the development of a comprehensive Travel Plan to be completed well within the September 2009 goal.

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3. **Politics:** Removing unnecessary roads is only one small (although well documented) component of a truly comprehensive travel plan. The Coalition represents 50,000 Oregonians who recreate in Mt. Hood National Forest, depend on it for drinking water, and believe that a truly comprehensive Travel Plan is less controversial than one which only caters to one user group.

A timeline for a comprehensive Travel Plan

The Restore Mt. Hood Coalition realizes that time is limited, but we also want the Forest Service to move forward in a way that is inclusive and thorough. The Coalition is sensitive to the September 2009 timeline for this process. By moving forward with an expanded scope the Coalition feels the process will be more effective and diminish the likelihood of an administrative appeal. In order to realistically accomplish the goals outlined above, we propose the timeline below that we believe will allow for the completion of the necessary Motor Vehicle Use Map by the September 2009 deadline.

- Re-issuance of Notice of Intent following required travel analysis February 2008
- Publication of Draft EIS August 2008
- Final EIS and accompanying Record of Decision completed November 2008

We understand the current constraints under which the Forest Service is working and offer resources and potential solutions to help alleviate some of the burden. We hope the Forest Service will move forward with an inclusive and transparent process that meets regulatory mandates, addresses ongoing resource impacts, and is responsive to diverse stakeholder concerns. By broadening the scope of the OHV Plan to be more consistent with the intent of the November 2005 Travel Management Rule, the Forest Service, the Coalition, and other stakeholders can work together to create a long-term and sustainable vision for MHNF that results in a stronger Mt. Hood recreational community, a more robust recreation infrastructure, improved relations with adjacent landowners and communities, and healthier ecosystems.

We would appreciate as soon as possible confirmation of your receipt of this letter and a written response to our proposals outlined herein by November 30th. It is our desire to meet with the plan ID team and forest supervisor to discuss these proposals in greater detail.

Sincerely,

The Restore Mt. Hood Coalition

Randy Rasmussen
American Hiking Society
946 NW Circle Blvd. #145
Corvallis, OR 97330

American Rivers
320 SW Stark Street
Suite 412
Portland, OR 97204

David Moryc

Thomas O'Keefe, PhD

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American Whitewater

3537 NE 87th St.
Seattle, WA 98115

Bob Sallinger

Audubon Society of Portland

5151 NW Cornell Road
Portland, OR 97210

Alex P. Brown

Bark

PO Box 12065
Portland, OR 97212

Noah Greenwald, M.S.

Center for Biological Diversity

PO Box 11374
Portland, OR 97211

Jurgen Hess

Columbia Gorge Institute

412 - 24th St
Hood River, OR 97031
541-386-2668

Barbara Wilson

Friends of Mt. Hood

12820 SW 20th Court
Beaverton, OR 97008

Lisa Moscinski

Gifford Pinchot Task Force

917 SW Oak St.
Portland, OR 97205

Ivan Maluski

Oregon Chapter Sierra Club

2950 SE Stark Suite 110
Portland, OR 97214

Jonathan Graca

**Hood River Valley Residents
Committee**

PO Box 1544
Hood River, Oregon 97031

Russ Pascoe

Lower Columbia Canoe Club

400 E 22nd Ave
Vancouver, WA 98663

Heather Campbell

Mazamas

527 SE 43rd Ave.
Portland, OR 97215

Neil Clark

**Northwest Environmental Defense
Center (NEDC)**

10015 S.W. Terwilliger Boulevard
Portland, Oregon 97219-7799

Tom Wolf

Oregon Council Trout Unlimited

22875 NW Chestnut St.
Hillsboro, OR 97124

Keith de Wit

Oregon Kayak and Canoe Club

8125 SW 71st Ave
Portland, OR 97223

Brett Brownscombe

Oregon Trout

65 SW Yamhill St.
Portland, OR 97204

Bill Erickson

Oregon Wild

5825 N. Greeley Ave.
Portland, OR 97217

Mary Scurlock

Pacific Rivers Council

917 SW Oak Street, #403
Portland, OR 97205